From: Franco DiFolco [Franco.DiFolco@csa-international.org]

Sent: Tuesday, February 19, 2008 3:00 PM

To: Kozanecki, Sarah

Subject: Lead Task Group Annex G Comments

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Hi Sarah,

I have several concerns/comments regarding the addition of Annex G to the NSF 61 Standard.

- 1. The NSF 61 standard is a performance based standard. Annex G is written as design requirements and does not include any performance requirements.
- 2. California has not officially stated how they will enforce this bill or if they would accept Annex G as a suitable vehicle for demonstrating compliance.
- 3. Other states (including California) have had prescriptive requirements for lead for years which have never been part of NSF 61 standard. Why are we starting now?
- 4. The language proposed, states that the manufacture has the <u>option</u> of meeting the requirements of Annex G or not. This would lead to confusion in the field.
- 5. These requirements should be covered by a separate stand alone standard/document

Sincerely,

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