



The Air Conditioning Contractors of America (ACCA) hereby appeals to the IAPMO Standards Council regarding the UMC TC's ballot rejection of proposed Tentative Interim Amendment (TIA) # 007-15. ACCA requests that the Standards Council review our comments below and consider approving our proposed TIA for publication for the 2015 UMC and for the pending publication of the 2018 edition.

Although ACCA's proposed TIA could only be submitted for the current edition of the UMC, our main concern is with the changes to the 2018 edition of the UMC which have not been published yet. Our proposed TIA is as follows:

1105.0 General Requirements.

1105.1 Human Comfort. Cooling systems used for human comfort shall be in accordance with the return-air and outside-air provisions for furnaces in Section 904.7 and Section 904.8. Cooling equipment used for human comfort in dwelling units shall be selected in accordance with ACCA Manual S to satisfy the calculated loads determined in accordance with ~~the reference standards in Chapter 17~~ ACCA Manual J or other approved methods. Refrigerants used for human comfort shall be in accordance with Section 1104.6.

ACCA Concerns with Proposed Deletion of ACCA Manuals from Table 1701.1

Earlier this year ACCA submitted public comments on proposed changes to the 2015 UMC which were considered during the UMC TC's meeting in Anaheim last May. Specifically, the proposed changes, as recommended by the UMC Standards Task Group, were to delete references to ACCA Manual D (*Residential Duct Systems*) and Manual J (*Residential Load Calculations*) currently found in Table 1701.1, and relocate them to a proposed new Table 1701.2. The Standards Task Group's reason was that the standards referenced in Table 1701.1 must also be referenced in the narrative of the code which are considered part of the requirements of the UMC. Standards that were **not** referenced in the narrative of the code were proposed to be relocated to a new proposed Table 1701.2 listing standards, publications and guides. In addition, the Standards Task Group had opined that ACCA Manuals D and J were not consensus-based standards and did not have enforceable language per IAPMO's criteria.

In its public comments, ACCA pointed out that the latest editions of ACCA Manuals D and J had been published as consensus-based ANSI standards and that those editions had included a "Normative" section specifically for code enforcement. (*The Monograph for the Anaheim UMC TC meeting confirmed that the ACCA Manuals met IAPMO's regulations for mandatory referenced standards.*) In addition, since both Manuals were only referenced in Appendix E they were not considered part of the UMC narrative and therefore could no longer appear in Table 1701.1. To correct this, ACCA's comments also proposed adding references to these Manuals in the applicable mandatory parts of the UMC to support having them stay in Table 1701.1. Moreover, ACCA Manual S (*Residential Equipment Selection*) was also referenced in Appendix E but was not shown in Table 1701.1, and ACCA's comments proposed this be addressed as well as it also met IAPMO regulations to qualify as a referenced standard.



During the UMC TC meeting in Anaheim, ACCA's comment proposing the addition of Manual D to proposed changes to 1601.2, *Sizing Requirements*, was accepted by the TC as it commented on a public review proposal. However, ACCA's comment proposing the addition of Manuals J and S to 1105.1, *Human Comfort*, was not accepted as 1105.1 had not been proposed to be changed and therefore was not subject to the public review process. During the Anaheim meeting there were several committee members who agreed that the situation needed to be addressed for the 2018 edition but IAPMO staff advised that ACCA's comment contained a proposal to an existing requirement that had not been subject to public review. Therefore, the TC rejected the proposal since it was deemed out of order. At the time IAPMO staff encouraged ACCA to consider filing a proposed TIA to attempt to fix the problem, especially for the pending publication of the 2018 edition of the UMC.

Opposition Comments During TC Ballot & Public Review of Proposed TIA

Many comments opposing the proposed TIA pointed out that if the proposal "failed in Anaheim," it should also be rejected as a proposed TIA. These comments appear to characterize ACCA's proposal as not having technical merit without being specific about it, when in fact many TC members in Anaheim had expressed support for the proposal but were advised by IAPMO staff that it could not be considered due to public comment procedures. ACCA believes these types of comments may have contributed to confusion regarding what happened in Anaheim relative to the ACCA proposal.

Further Background on Emergency Nature

ACCA stated that the emergency nature of its proposed TIA was supported by Section 5-2(a) "*The document contains an error or an omission that was overlooked during a regular revision process.*" By removing these Manuals from being referenced in Table 1701.1, code officials and users of the code would not be able to determine what standards are to be used if the coverage in Appendix E was going to be followed. When requirements for load calculations, HVAC equipment sizing and HVAC equipment selection were initially added to the UMC, at that time the committee agreed to have the 1105.1 passage refer to the standards for doing same by calling out the requirements found in Table 1701.1. Hence, ACCA Manuals J, D, and S were not specifically named in the narrative of the code, but were simply referenced in Table 1701.1

ACCA also added another statement supporting the emergency nature for the TIA by noting that by not mandating the use of Manuals S and J, the safety and performance of the HVAC system could be adversely affected and potentially impact the health and safety of the occupants. To further expand on this, one obvious concern is related to the potential for "undersizing" or "oversizing" HVAC equipment if these Manuals are not followed. Such a condition could create excessive humidity levels in a home which in turn allows for the formation of mold with its potential associated health effects.