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Submitted VIA email at [mo.madani@myfloridalicense.com](mailto:mo.madani@myfloridalicense.com)

Mo Madani  
Florida Building Commission  
2601 Blair Stone Rd.  
Tallahassee, FL 32399

RE: Support for Proposal M-FBC-R Ch 46 – Glitch #1

Dear Mr. Madani:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) submits this letter in support of the approval of Proposal M-FBC-R Ch 46 – Glitch #1, submitted on Friday, April 19, 2024, by Mrs. Amanda Hickman.

AHRI represents more than 330 manufacturers of air conditioning, heating, and refrigeration equipment. It is an internationally recognized advocate for the heating, ventilation, air conditioning, commercial refrigeration (HVACR), and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 704,000 people.

As currently written, the Florida Building Code (FBC) Residential Code creates an inconsistency between the Mechanical and the Residential parts of the 8th Edition of the FBC for the same standard. The Mechanical Code references the 2019 Edition of UL 60335-2-40 and the Residential references the superseded 2012 Edition of UL 60335-2-40.

Presently, only the 2019 Edition of UL 60335-2-40 (and the most recent 2022 Edition referenced in the 2024 Edition of the I-Codes) is considered by UL for testing, certification and listing of HVACR equipment. HVACR equipment can no longer be listed to the 2012 Edition of UL 60335-2-40. This error could result in the inability for manufacturers to supply equipment to Florida that is compliant with the FBC Residential Code.

AHRI asks for the Commission to approve Proposal M-FBC-R Ch 46 – Glitch #1 to ensure that consumers and businesses enjoy uninterrupted access to the latest HVACR equipment. If you have any questions, then please contact me at the phone number listed below.

Regards,

Thomas J. Deary  
Director of Codes  
703-600-0338