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January 22, 2007

Mr. Mo Madani
Technical Manager
Department of Community Affairs
Building Codes and Standards
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Dear Mo:

We request the opportunity to discuss the recent 2006 Revision to the 2004 Florida Building Code, specifically, Chapter 13, Section 412.1.ABC.3.1, regarding the performance standards of heat pump pool heaters at the Feb 5-7 meetings in Tampa, FL.

To the best of our knowledge, there is no manufacturer capable of meeting the COP requirement. We here at Aquacal strive to manufacture the best products on the market, and we welcome the challenge of meeting this new standard. We are excited to reside in a state which sets such lofty goals regarding energy efficiency. We humbly request a reasonable implementation table to allow members of this industry to design for this criteria.

This change in policy represents a huge change to our industry bringing to the forefront one of our product's greatest assets. Unfortunately, based on current published manufacturers COP data, Florida swimming pool heat pump sales would drop to zero. For on demand heating of swimming pools, Florida customers would be forced to use less efficient Gas, Electric, or Oil. A rapid implementation of this standard would negatively impact the economics of several companies in the state as well as increase the environmental impact of heating swimming pools (which at the new standard's core is opposite of the intended result).

Please grant our request for a formal agenda item at the upcoming Tampa Meeting to further discuss this matter.

Stephen Baxter
Engineering Manager
Aqua Cal, Inc.

cc:

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