



ROBERT J. RASP
President & CEO

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:

It has come to our attention that the Florida Building Commission will be holding a meeting from February 5, 2007 to February 7, 2007 in Tampa, Florida. This letter is being sent to formally request that the Commission consider placing an agenda item on the schedule during those meetings to discuss the 2006 Revision to the 2004 Florida Building Code, Chapter 13, Section 412.1.ABC.3.1, regarding the performance standards of heat pump pool heaters.

As we have previously indicated, and after discussion with six (6) of the largest heat pump pool heater manufacturers in the United States, we have now confirmed that the new Coefficient of Performance ("COP") requirement, as currently written into the Florida Building Code, is a standard that no heat pump pool heater manufacturer can currently meet. By immediately beginning to enforce such requirements the state of Florida may unintentionally end up effectively banning all pool heat pump sales from the Florida pool and spa market. In fact, we know of one large manufacturer that has already ceased selling heat pumps in the Florida market as a result of this new requirement.

While we support legislative and industry efforts to require products with increasingly better efficiencies and also support third-party testing of products to confirm manufacturers' ratings, we would request that appropriate time be given to manufacturers to redesign, develop and test new products which will be capable of meeting Florida's improved efficiency and performance requirements. Changes of this magnitude are typically implemented with a phase-in period for compliance.

Again, we request that the Florida Building Commission place an agenda item on its schedule to discuss this very important topic with the pool heat pump manufacturers during its meetings from February 5, 2007 to February 7, 2007. If the Commission agrees to do so, we believe representatives from at least four or five pool heat pump manufacturers will be in attendance.

Thank you for your consideration of this request.

JANDY POOL PRODUCTS, INC.

By: 
Robert J. Rasp – President and CEO

cc: Shajee Siddiqui
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