

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE 15-DAY NOTICES DATED JUNE 16, 2011
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: JUNE 30, 2011

Date: 6/17/11

From:

Don Stevens, National Research and Development Manager
Name (Print or type)


(Signature)

-- Panasonic Home and Environment Co

Agency, jurisdiction, chapter, company, association, individual, etc.

PO Box 398/1800 Pacific Ave, Keyport
Street City

WA
State

98345-0398
Zip

I/We (**do**)(do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 4.506.1

and request that this section or reference provision be recommended:

[X] Approved [] Disapproved [] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:
None

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Panasonic appreciates the opportunity to comment on the proposed modified language related to the requirements for humidity controls for bathroom fans. As we originally proposed, we support the change of the term from "humidstat" to "humidity control" as the more appropriate term for this type of control. We support the decision to keep the language related to a maximum Relative Humidity setting point of 80% as appropriate. The most commonly recommended range of RH level for residential occupancies is 40 to 55% RH to minimize the presence of dust mites and the growth of molds. While Mike Moore's comment on the 80% maximum being too low addressed the need to allow the occupant to disable the system by setting it high, your stated intent of requiring an automatic humidity control in all bathrooms to reduce the potential for moisture-related problems in the dwelling unit is better served by keeping this maximum setting at 80%. A case could be made to lower it even further in dry California, but the 80% maximum is a good national threshold for a product. My experience over the past 30 years of energy and ventilation code and product development is that people will tend to disable

something they do not understand and keeping the maximum at 80% helps to reduce the potential for disablement. You as a code agency want the fan to operate to do its job and we as manufacturers want it to be used as well. We at Panasonic have developed several fans specifically to meet this requirement and have adjusted the maximum setting to 80% to meet your new code. Finally, we applaud the addition of the language to allow either a manual or an automatic adjustment of the humidity control setting that allows for the product innovation that we strive to provide.

Thank you.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.