



Potomac Communications Group, Inc.

MEMORANDUM

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Subject: Results of CMA Label Certificate Focus Group Session

We recently conducted a focus group, via Microsoft Live Meeting, with three building officials to solicit input on the design and content of a CMA Label Certificate. The building officials represented Killeen, Texas, San Jose, Calif., and Dewey, Ariz. Prior to the focus group session, we distributed a one-page background sheet on NFRC and the Component Modeling Approach, the current site-built label certificate, and the proposed draft CMA label certificate.

Initial Impressions

We began the session by gauging the participants' familiarity with NFRC – particularly in the non-residential arena. The officials in Arizona and California indicated they were very familiar with NFRC, while the official from Texas mentioned that they look for the NFRC label in residential inspections, but that he wasn't familiar with it in commercial applications. In his words, "I'm not, but I should be."

The first theme to emerge from this session is that building officials trust the NFRC label, and all indicated if and when they came across a new kind of Label Certificate for CMA they "would be confident" in it because it came from NFRC.

We walked them through the proposed CMA label certificate and asked for general impressions, i.e., what type of information they would like to see, would something like this be useful to them, etc. Initially, the officials were looking for the actual label – as they would on the Site-built Label Certificate. We directed them to the product listing page which broke down individual values, and they felt that was the most important feature. One official remarked that having all of that information was a "real added benefit" to the plan checker.

While all of the building officials expressed trust in NFRC, they all questioned who would do the calculations on the label certificate, and who would make sure they were accurate. After explaining the ACE concept, they had a better grasp, but all seemed to favor the idea of an independent ACE. Someone said, "I'd question how much validity I'd give to this if it was site-assembled and not pre-assembled." This topic of how someone is accredited, and who assumes responsibility for the calculations came back to the forefront of discussion on a few occasions throughout the session. One official kept coming back to the notion

that if all the IGUs, frame, and spacers are sitting in a warehouse and they're sent to the site to be assembled, how does he know if they're put together and installed correctly.

Label Certificate Specifics

There was a fair amount of discussion surrounding the “actual size” values vs. the “NFRC size” values. The officials noted it was somewhat confusing and were unsure of what the benefits of that would be. They agreed that they wanted the actual size to be there, and were willing to trust that there was a reason for the NFRC size. They recommended that there be an explanation on the Label Certificate if the NFRC size values are listed as well.

There was discussion on the other components listed – and some expressed concern that there might be too much detail. One official noted that it would be hard to determine other components that they maybe are not familiar with, and another echoed it was extra information for reference. Essentially, they all agreed as long as the U-Factor, SHGC and VT were listed, they were happy.

However, one official expressed interest in seeing the components individually labeled, asking “would that be overly cumbersome?” We reminded him that NFRC aims for whole product performance, and that would likely be the required element. Some said they wanted the additional information, but noted that the industry would not be pleased.

Compliance

All three officials indicated that this would aid them in code compliance. One official remarked that because there are so many variables, you “almost have to have the data for the holistic view of the window.” Another official said that having all of this information will help him in the event he needs to challenge a project.

“I like what you have here, gives a holistic approach on a site-built window. If I don't like what they're assembling, we'll challenge it, and if it's right, it's right.”

- Arizona Building Official

The official from California mentioned that since the California Energy Commission had become increasingly more stringent on enforcement, it has been especially difficult in the commercial arena. He was eager for a program of this nature and noted it was “handy” and “easy.” The building official in Texas again noted that compliance is a weakness in his jurisdiction and this form would help him and his inspectors.

Another official noted that this program would put him at ease, and asked about site-checks at factories and manufacturers to make sure components are meeting requirements. This again brought up the issue of the ACE. We reminded them of the way the residential program is set up, and that NFRC hoped to mimic the trust that is built into that system. As always, education will be key as NFRC rolls out CMA.

They also mentioned they would be putting faith in the industry. They expressed that the commercial guys are experts in their trade – and there shouldn't be an issue with compliance.

In closing, we asked the participants what would be the best way to provide them with information about the CMA program. All indicated that state building officials meetings are an excellent way to distribute information, as well as building trades and emails.

Next Steps

We propose to set up a second conference call to expand on the information we received from these three gentlemen. The membership may question results from such a small group. The cost involved would be minimal, as the moderator's guide is already complete. We would propose to involve building officials from the northwest, southeast, and northeast.