

NFRC 100_Complex Products Ballot ([click here to access the original proposed ballot](#))



Legend:

AC: Approve with Comment

NEG: Negative response with Comments

**NFRC Ballot Comments through November 2, 2009
Technical Committee – CMA Technical Subcommittee**

| Company Name, Rep Initials | AC/NEG | Section and/or Page # | Comment/Alternate Language |
|---------------------------------|--------|-----------------------|---|
| Birch Point Consulting, LLC, TC | NEG | In General | Remove corner products. This would add thousands and thousands of frames and complexity with no significant benefit. Also, while I support the idea of added flexibility and recognition of the wide range of products, I wonder if now is not the right time for this change when CMA is just starting. |
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| Architectural Testing, MT | NEG | In General | I do not believe these configurations should be rated as standard configurations, as they are just a small portion of the potential product combinations out there. Rules to handle these products on specific projects should be developed for the CMA program. |
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| Pella Corp., JH | NEG | In General | Pella/EFCO recommends shelving this ballot for at least one year to allow the industry to focus on getting CMA up and running with simple product configurations. As a manufacturer we're trying to figure out how to get all of our products into CMAST with just the basic configurations. Once CMA is established and the bugs are worked out, we can regroup and draw on a year's experience with CMAST to determine how best to tackle complex products. |
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| Pella Corp., JH | NEG | Section 5.9.6.3.4 (Determining U-factor rating for Corner Products) | The testing and certification of corner products adds an additional layer of complexity to the certification process with little overall benefit. Sub-paragraph B admits that corner products cannot be easily tested in the hot box chamber. In addition, the ballot requires that if the corner frame member does not have a U-factor within 20% of the rest of the wall, a separate validation needs to be done with the frame component that has closer thermal performance as the corner framing component. What if the manufacturer doesn't have another frame component available to use? This is a substantial gap that will need to be addressed. |
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| Pella Corp., JH | NEG | Section 5.9.6.3.5 (Determining U-factor rating for Combination, Composite, and Custom Products) | If NFRC moves toward certifying all configurations and sizes, there is a danger of adding significantly to lead times and costs to manufacturers. A large manufacturer may have half-a-dozen meeting rails and over 30 mullions for one system. If they have over 50 product lines, the sheer number of thermal models to get everything into CMAST becomes staggering. This cost can be expected to ultimately be absorbed by the consumer and as such may not be in the consumer's best interest. |
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