The ballot is presenting a new program, NFRC 715, “Commercial Energy Performance: Products & Projects” used for rating commercial fenestration products. This program is being concurrently introduced with the technical procedures as provided in the ANSI/NFRC 100 New Commercial Ballot, ANSI/NFRC 200 New Commercial Ballot and ANSI/NFRC 500 New Commercial Ballot.

Associated Program Administrative Topics

If this ballot passes, fully implementing the changes will affect:

1. Related documents changes
   a. The corresponding documents ANSI/NFRC 100, 200 and 500 shall be held in abeyance until the NFRC 715 is approved by membership. All technical documents and the NFRC 715 shall be forwarded to the Board of Directors at the same time.

2. Software updates
   a. The extent of software needs has not yet been confirmed.

3. Estimated cost of full implementation had not been determined at this time.

4. Estimated time for full implementation is 18 to 24 months post ballot approval.

5. Business Rules are yet to be determined.

6. Program Processes are being introduced with this NFRC 715 document.

7. Pending other Committee/Board approval – Corresponding documents ANSI/NFRC 100, 200, and 500 are under balloting.

8. Other – Implementation
   a. The implementation of this methodology has many topics to consider. This ballot does not contain any recommendations for implementation. The intent is to keep the current (traditional) simulation methodology (Site-Built and CMA) in effect until those methodologies are no longer in use.
## NFRC 715 Commercial Ballot

**NFRC Ballot Comments/Motion Form – Fall 2020**

**Ratings Committee, NFRC 715 Subcommittee**

### Company Name, Rep Initials | Response Number
--- | ---
Kawneer, G. McKenna | 001

### NFRC Member Vote Tally

- AP: 26
- ABS: 22
- NEG: 5
- Total: 53

### Legend:

- NEG: Negative with Comments
- W-PM: Withdrawn Prior to Meeting
- W: Withdrawn at Meeting
- S: Substantive
- E: Editorial
- NGR: Non-Germane

### Motion 1st | Motion 2nd | Result | Vote
--- | --- | --- | ---

### Motion Language

**As balloted:**

Installation related parts such as, but not limited to, panning, frame receptors, and clips may be rated with the product but only when such parts are required for installation of the product; reference ANSI/NFRC 100, section 4.2.5.C.

**Update to the following:**

Installation related parts such as, but not limited to, panning, frame receptors, and sub sills shall be included in the rating if these components are used on the project; reference ANSI/NFRC 100, section 4.2.5.C.

Non-continuous installation parts shall be modeled per the simulation manual. Boundary conditions for the fully assembled cross sections inclusive of all modeled components shall be applied per NFRC rules as found in ANSI/NFRC 100 and 200.
**Company Name, Rep Initials**  
Birch Point Consulting, LLC., T. Culp  

**Response Number**  
002

**Legend:**  
NEG: Negative with Comments  
W-PM: Withdrawn Prior to Meeting  
W: Withdrawn at Meeting  
S: Substantive  
E: Editorial  
NGR: Non-Germane

**Section and/ or Page #**  
Section 3.1.1 Installation Parts

**Comment/Alternate Language**

The stuff in the sim manual is about non-continuous components that are part of the framing system, such as skip-and-debridge thermal breaks, intermittent bolts on curtain wall, etc. Not about clips or fasteners attaching a product to surrounding materials. That would be too onerous, and we don’t include those in the other NFRC programs. However, we should include subsills and receptors that are required as part of the product.

As balloted:
Installation related parts such as, but not limited to, panning, frame receptors, and clips may be rated with the product but only when such parts are required for installation of the product; reference ANSI/NFRC 100, section 4.2.5.C. Non-continuous installation parts shall be modeled per the simulation manual.

Suggested wording:
Installation related parts such as, but not limited to, subsills, panning, and frame receptors shall be rated with the product but only when such parts are always required for installation and performance of the product; reference ANSI/NFRC 100, section 4.2.5.C.
question about 4th bullet point: is this supposed to be part of the greater than 10% case only? If so, make it part of the previous bullet point, because it is confusing how it would apply to or overlap the less than 10% case where the additional number of reports is "equal to the number of audits found to be unsatisfactory.

- (3rd Bullet) When greater than or equal to 10% of compliance audits are deemed to be unsatisfactory, an additional 30% of their eligible project certificates (minimum of four) shall be audited. All costs for the additional compliance audits shall be borne by the LCS. If all project certificates have already been audited, all project certificates shall be audited prior to issuance until the required number of compliance audits is achieved.

- (4th Bullet) The LCS shall also be put into a probationary status whereby all project certificates shall be audited prior to issuance until they achieve an evaluation of satisfactory in their probationary period. The probationary period shall be in effect until at least the number of additional audits conducted is equal to or greater than 10% of the number of project certificates generated during the year that was most recently deemed unsatisfactory. The probationary period shall begin as determined by NFRC after all additional audits required by this evaluation have been completed. Suspension or revocation of NFRC LCS status may occur for excessive unsatisfactory performance.
**Company Name, Rep Initials** | **Response Number**
---|---
Birch Point Consulting, LLC., T. Culp | 004

**NEG**

**Substantive**

**Section and/ or Page #**

**Section 8.7.2 Air Leakage Reporting**

**Comment/Alternate Language**

This section is currently inconsistent and incompatible with the building energy codes. **Just list the actual result rather than this <= stuff.** Or if you do <=, then you have to make it more complete to be consistent with the code: <= 1.0 for glazed swinging entrance doors and glazed power-operating sliding or folding entrance doors; <=0.06 for curtain wall and storefront; <= 0.3 at 1.57 psf or 0.5 at 6.24 psf for unit skylights with condensation weepage openings; <= 0.4 for glazed sectional garage doors; <= 0.2 at 1.57 psf or <= 0.3 at 6.24 psf for all other window, skylights, and glazed doors. And that may vary based on location and what code they have. Just remove that and report the tested value. Also, the codes and specifications have various options based on different product types allowing NFRC 400, ASTM E283, and AAMA/WDMA/CSA 101/I.S.2/A440. Need to allow all of these to be included in the reporting to make this usable to the code official.

**Motion 1st** | **Motion 2nd** | **Result** | **Vote**
---|---|---|---

**Motion Language…………..**

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**Legend:**

NEG: Negative with Comments
W-PM: Withdrawn Prior to Meeting
W: Withdrawn at Meeting
S: Substantive
E: Editorial
NGR: Non-Germane
Company Name, Rep Initials | Response Number
--- | ---
Keystone Certifications, J. Hill | 005

NEG
Substantive
Section and/or Page #
Section 2.1 Project Upload Path
Comment/Alternate Language

No oversight to NFRC 715 2.1 Project Upload Path regarding the IA validation process of components being listed in CMAST. If a project is not selected for QA verification, the product no longer gets validated by the IA.

Oversight in the past has been provided by the IA for Validation and approval of components.

With CMAST, once a component is listed, that component is never removed or re-verified during the life of that component until it is removed by the manufacturer. If a component is incorrectly simulated, the potential for numerous errors for other label certificates could happen. IA validation is necessary to provide checks and balances in this process, as it has in the past.

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Motion Language.............

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W: Withdrawn at Meeting
S: Substantive
E: Editorial
NGR: Non-Germane
Company Name, Rep Initials | Response Number
---|---
Keystone Certifications, J. Hill | 006

**NEG**

**Substantive**

**Section and/ or Page #**

Section 7.2.1 Initial In-Plant Inspection

**Comment/Alternate Language**

This section is contradicted by the referenced NFRC 700 5.3 in NFRC 715 7.2.1. NFRC 700 5.3.C.i. Site-built, "Exception: The requirement of initial inspection shall be waived for site-built product certification authorization; an inspection of the Site-Built Licensee's facility shall be conducted by the IA within one year of the issuance of an NFRC Label Certificate."

Site Built Licensees do not manufacturer their products in-house If an inspection is required at the facility, and there is no extrusions or glass at the facility to verify, could it be appropriate to review documents sent electronically to verify the issued NFRC Label Certificate meets the inspection requirements?

Needs clarification their Site-built QM requirements. Currently IA's do not require Quality manuals for Site-built Licensee. Inspections are not conducted at the Manufacturer's facilities. Follow up documentation is provided by the Licensee to the IA for Site-Built certifications a calendar year after the issuance of a NFRC Label Certificate.

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Motion Language.............

**Legend:**

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E: Editorial
NGR: Non-Germane
## Company Name, Rep Initials | Response Number
---|---
Keystone Certifications, J. Hill | 007

### NEG
**Editorial**

**Section and/or Page #**

**Ballot Cover Page (General)**

**Comment/Alternate Language**

Ask for better definition in the "implementation" ballot paragraph. "recommend that wording be changed to "until new methodology is in place."

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**Motion Language………….**

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- **NGR**: Non-Germane
Company Name, Rep Initials | Response Number
---|---
Quast Consulting and Testing, S. Skoglund | 008

**NEG**

Substantive

**Section and/ or Page #**

Section 1.1 & 6.4 Scope of Project Upload Path & IA assignment

**Comment/Alternate Language**

1) Suggested the removal of the requirement for the NFRC accredited simulation laboratory to contract with an NFRC Inspection Agency upon review of the certificates produced at a client's request. Projects on a certificate, the accuracy, and cost should be burden of the entity that requests the certificate. The contact information of the person who requested the certificate is provided on the final printed certificate; therefore a "Certificate Requestor" is the role introduced into the 715 language on the edited ballot submitted. Additional reasoning's and suggested requirements can be found in the submitted documents.

A certificate requestor is audited by the IA for accuracy of certificate components to project components. A LCS is audited by NFRC during a bi-annual review for accuracy of the certificate based on project documents supplied by Certificate Requestor. By having the certificate requestor be the responsible party for a certificate and the information provided therein keeps the CEPC program as something the certificate requestor is licensed under and held lawfully to.

**Motion 1st** | **Motion 2nd** | **Result** | **Vote**
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**Motion Language..........**

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**Legend:**

NEG: Negative with Comments
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NGR: Non-Germane
### Company Name, Rep Initials | Response Number
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**Quast Consulting and Testing, S. Skoglund** | 009

**NEG**

**Substantive**

**Section and/ or Page #**

**Section 6.1 and 6.2 Project Upload Path Compliance Audits**

**Comment/Alternate Language**

2) Suggested to **change total amount of certificates by one simulator to be audited at 4 maximum.** This simplifies the selection process and more accurately reflects the commercial market and the amount one simulator normally produces in a year today. The language stated a 10% of all certificates and minimal of 4 certificates in a year. If 40 certificates were prepared than 10% would be 4. 40 certificates by one simulator is a large number which is not often the case in the commercial industry.

1) 6.1: Modified language to make a general statement that certificates are subject to audits.
2) 6.1 Comment 4: Language states audits are “performed annually” when the number of certificates vs it’s drawings, spacer systems, and glazings may exceed a reasonable number for an IA to review. See comments for sections 6.2 below.
3) 6.2: Language in 6.1 is written that audits happen “annually”; Language in 6.2 is written that a certain percentage of certificates will be selected and sent to an IA to review of an individual LCS but not less than 4. The only way a percentage can be taken is if it is at the end of a year. The amount of certificates vs it’s drawings, spacer systems, and glazings may exceed a reasonable number for an IA to review in a timely manner. Quast is suggesting to make the compliance audit simple and only require 4 certificates (at minimum, if applicable) at the time of creation in a year be audited, and that those be the first 4 certificates produced by the LCS.

   a. The number of certificates to be audited are to be no less than 4. For example 4 is 10% of 40 certificates by one LCS, 40 by one LCS is a large number which is not often the case in the commercial industry.
   b. Each audit requires simulation Therm and WINDOW files, reports, drawings, spacer systems, glazing systems and other documentation to prove the certificates validity.
   c. Although, this is normal practice on a project by project basis with simulator’s role today. This does creates a logistical nightmare with paperwork, coordination, storage, employee time (LCS or IA), employee availability (vacation, sick, other), NFRC is also required to review the outcome of the audits and carry out next requirements which often falls onto one staff person’s time. All these factors can be extremely overwhelming when multiple certificates and documentation are required all at once.
   d. The provided 30 days to review multiple files may not be adequate considering normal job backlogs and industry spikes or employee availability.
   e. The timeliness of an annual audit on certificates that were from 12+ months prior is ineffective to its accuracy or any certificates that may have followed.
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- NGR: Non-Germane
### Comment/Alternate Language

3) **Suggested the elimination of preliminary label certificates** based on the concern that they are being used as official documents instead of final certificates. (see comment for Section 1.1, #2) Suggest that preliminary certificate is either not audited as required in 6.1 based on the premise that they are not final or certified. Or if the main concern is that NFRC preliminary certificates/documents are being used instead of final certificates, then eliminate preliminary certificates completely to avoid confusion. In a commercial project “Certification” is just one minor part in an entire project that entities may see a preliminary certificate and assume that “certification” is now complete and never move forward to a final. Suggestion is to allow these projects to use non-NFRC issued method where a laboratory reports serves as a “bid” documents and when ready to move forward with NFRC Final Project Certificate (FPC).

Are preliminary and final certificates allowed in product path?

### Motion Table

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- **E**: Editorial
- **NGR**: Non-Germane
**Company Name, Rep Initials** | **Response Number**
---|---
Quast Consulting and Testing, S. Skoglund | 011

**NEG**

**Editorial**

**Section and/or Page #**

Section 1.2 and 6.3

**Comment/Alternate Language**

1.2 Change Final Project Certificates to **FPC**, acronym created within 1.1

6.3 Change including to **include**

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**Motion Language…………..**

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NEG

Substantive

Section and/ or Page #

Section 1.3.5 & 1.3.6 Role of LCS & Frame Manufacturer

Comment/Alternate Language

1.3.5 Remove that the LCS contracts with IA and move that requirement to 1.3.7 the certificate requestor.

(NEW) Role of the Frame Manufacturer specifications are suggested but at minimal is required to be in the document as they will need to be licensed with NFRC, assign a sim and test lab, assign an IA in order to be in the CEPC program. Language suggested:

1.3.6 Role of the Frame Manufacturer

Under the Commercial Energy Performance Program, an NFRC frame manufacturer Licensee is responsible for meeting the requirements in the NFRC 715 and NFRC 700 (as applicable) including, but not limited to, the following:

A. Arranging with one or more NFRC-licensed IAs to obtain NFRC Certification authorization or one or more product lines;
B. Arranging with one or more NFRC-accredited simulation laboratories, who employs a LCS, for the purposes of conducting simulations and developing the matrix required for rating the licensee’s frame components;
C. Arranging with one or more NFRC-accredited testing laboratories for the conducting of the thermal tests required for rating the licenses’ products;
D. Authorizing testing and simulation laboratories to provide an IA with copies of simulation and testing results and necessary support data for the purpose of determining compliance with Certification Program requirements;
E. Maintaining an in-plant quality control program to assure consistent quality as it relates to energy performance characteristics of products authorized for certification;
F. Cooperating with in-plant inspections of manufacturing facilities to determine continued compliance with the Certification Program requirements;
G. Entering into a license agreement with NFRC authorizing the Licensee to use the NFRC registered mark on certified products and in advertising;
NFRC 715 Commercial Ballot

NFRC Member Vote Tally
AP 26
ABS 22
NEG 5
total 53

NFRC Ballot Comments/Motion Form – Fall 2020
Ratings Committee, NFRC 715 Subcommittee

Company Name, Rep Initials | Response Number
--------------------------|-------------------
Quast Consulting and Testing, S. Skoglund | 013

NEG

Substantive

Section and/or Page #

Section 1.3.7 Role of Project Upload Path Certificate Requestor & 6.7.1

Comment/Alternate Language

(NEW) Role of the Project Upload Path Certificate Requestor: Language is suggested for the role being the responsible party who provide the drawings, spacer systems, and glazings and request certificates.

Language suggested:

1.3.7 Role of the Project Upload Path Certificate Requestor

The certificate requestor is a person who intends to have a single project certified into the online CPD and receive a project certificate using the project upload path. The certificate requestor shall perform the actions specified in the program, including, but not limited to, the following:

A. Entering into a license agreement with NFRC authorizing the user to obtain project certificates for the project;
B. Maintain their name, company affiliation (as applicable), and contact information for use in the CPD;
C. Providing drawings in draft form for an LCS to simulate the project;
D. Providing final approved drawings for an LCS to create an FCS;
E. Providing project details for product lines, spacer systems and glass to an LCS;
F. Contracting with an NFRC licensed IA for follow up compliance audits

6.7.1 Modified the responsible party to receive and take action on compliance audit results from LCS to Certificate Requestor

Motion 1st | Motion 2nd | Result | Vote
-----------|-----------|--------|------

Motion Language...............

Legend:
NEG: Negative with Comments
S: Substantive
W-PM: Withdrawn Prior to Meeting
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<td>014</td>
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**NEG**

**Substantive**

**Section and/ or Page #**

**Section 1.3.8 Role of Product Directory Certificate Requestor**

**Comment/Alternate Language**

*(NEW) – Role of the Product Directory Path Certificate Requestor:*

- This role is needed to be included in the Product Directory Path when a certificate is created, but Quast did not supply language for the audit of those certificates in Section 9 “Product Directory Path Certificates”.

Language suggested:

1.3.8 Role of the Product Directory Path Certificate Requestor

The certificate requestor is a person who requests a project certificate using the product directory path. The certificate requestor shall perform the actions specified in the program, including, but not limited to, the following:

A. Entering into a license agreement with NFRC authorizing the user to obtain project certificates for the project;
B. Maintain their name, company affiliation (as applicable), and contact information for use in the CPD;
C. Providing drawings in draft form for a Licensed User to simulate the project;
D. Providing final approved drawings for a Licensed User to create an FCS;
E. Providing project details for product lines, spacer systems and glass to a Licensed User;
F. Contracting with an NFRC licensed IA for follow up compliance audits

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Motion Language...........
Added language that “Final Drawings” shall be the responsibility of the person requesting certificate. LCSs are not part of the construction team on a commercial project and should not bear the liability of guaranteeing the shop drawings in their possession are absolute and final for the project.

3.1 Product Selection

Product selection for the project shall be at the discretion of the assembler of the final products and represented on the final approved drawing package. **Final drawings shall be supplied with formal signed documentation that the supplied drawings are final.** Representative products which characterize some or all the products of a specific type and/or installation may be used.
Suggested modification to required statement on Final Certificate to specify that final drawings were used for the project and adding language that responsibility of the certificate is to the person requesting the certificate.

- The following statement from the LCS generating the certificate:
  I attest the ratings on this certificate are accurate for the products described and were calculated using NFRC procedures and approved software. The products listed on the certificate are representative of the final drawings for the referenced project as supplied by the person requesting the certificate. The person requesting the certificate has provided and bears the responsibility of accuracy for the documentation used to create this certificate. NFRC and the creator of this certificate are not responsible for any material changes to the specified products which affect the ratings or for any misrepresentation of the products by the person or firm requesting the certificate.
Quast Consulting and Testing, S. Skoglund

NEG

Substantive

Section 6.5 and 6.7 Compliance Audits Certificate Selection & Assessment

Comment/Alternate Language

6.5: Modified the time frame for IA to receive files in order to review the validity of a certificate to 30 days. This takes into consideration a contact’s availability, back log, or other circumstances listed in previous comments.

The Certificate Requestor shall have 30 days to submit the required documentation to the IA once the notice of audit has been received.

6.7: Included a time frame for NFRC to review IA’s reports on compliance audits.

Compliance Audit Assessment

NFRC shall assess each compliance audit within 30 days of receiving the IA’s report using the following criteria:
Recommend that the CEPC program requirements of an LCS are made in general in the 715 and moved to the NFRC 701 documents. LCS and accredited labs have signed a license agreement under the 701 documents and not the 715.

The 715 is a licensee’s responsibility with the sim lab, and not what the sim labs’ responsibility is.

All processes and requirements will need reviewed in the 701 when language is drafted.

Proposed language:

- Less than 10% of the audits are found to be unsatisfactory per the criteria of Section 6.7 – The LCS shall be evaluated as provisional until 100% satisfactory per the criteria is met.
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**NEG**

**Substantive**

**Section and/ or Page #**

6.8.1 Required Actions After Evaluation

**Comment/Alternate Language**

Challenge and Appeals: The 714 is only for the Spectral Data Library (IGDB) or the NFRC 101 materials library. The 700 document houses challenge and appeals procedure for the 700 program. The 705 document houses challenge and appeals procedure for the 705 program. Since the 700 is already referenced as required procedure to follow in the section 7, it can be referenced here too.

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**Motion Language*******
If NFRC 700 is referenced and used as a program requirement, a frame manufacturer will have to be dual licensed so that they are required to follow the 700 rules.

7.1.1, the sentence leads to more specific need of reference to 700 section 5.1. Section 5 only as written here is too general especially since the remainder of 715’s section 7 breaks down other portions from 700’s section 5.

Add new section 7.2 to reference NFRC 700 section 5.2.

7.2 IA Review of Simulation and Test Reports for Validation
### Company Name, Rep Initials | Response Number
---|---
Quast Consulting and Testing, S. Skoglund | 021

**NEG**

**Substantive**

**Section and/ or Page #**

**Section 9 Product Directory Path Certificates**

**Comment/Alternate Language**

The product directory path also allows full certificates to be supplied. Therefore, the product directory path certificates will also require certificate requestor to have compliance audits as drawings still need to match product selected as well as verification of spacer suppliers, and glazing contractors.

While accuracy of the calculation can perceivably be guaranteed by the cited “calculation tool”, there is no verification that the components used in the calculation match the components used on the project. ACEs are currently audited under this exact premise.

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**Motion Language**********
NFRC 715 Commercial Ballot
NFRC Ballot Comments/Motion Form – Fall 2020
Ratings Committee, NFRC 715 Subcommittee

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<td>022</td>
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NEG

Non-germane

Section and/ or Page #

General

Comment/Alternate Language

Why another program added?

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<th>Motion 1&lt;sup&gt;st&lt;/sup&gt;</th>
<th>Motion 2&lt;sup&gt;nd&lt;/sup&gt;</th>
<th>Result</th>
<th>Vote</th>
</tr>
</thead>
</table>

Motion Language.........

Legend:
- NEG: Negative with Comments
- S: Substantive
- W-PM: Withdrawn Prior to Meeting
- W: Withdrawn at Meeting
- E: Editorial
- NGR: Non-Germane
Company Name, Rep Initials | Response Number
---|---
Katerra, K. Vilhauer | 023

**AFFIRMATIVE**

**Editorial**

Section and/ or Page #

**Ballot Cover Image**

**Comment/Alternate Language**

I approve but suggest that the cover image be changed to a commercial building photo rather than a residential photo.

<table>
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<tr>
<th>Motion 1&lt;sup&gt;st&lt;/sup&gt;</th>
<th>Motion 2&lt;sup&gt;nd&lt;/sup&gt;</th>
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</table>

**Motion Language………..**

Legend:
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Ballot Name Here

(I will insert a hyperlink to the original ballot here – do not change)

NFRC Ballot Motion Form – Fall 2020

Committee Name, Subcommittee Name, TG Name

<table>
<thead>
<tr>
<th>Motion Originator – Rep Initials</th>
<th>Date</th>
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<table>
<thead>
<tr>
<th>Second – Rep Initials</th>
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<table>
<thead>
<tr>
<th>Motion Text</th>
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### Record of Votes

**Voice Vote**

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<tr>
<th>Pass (unanimous)</th>
<th>Fail (unanimous)</th>
<th>Pass</th>
<th>Fail</th>
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<tbody>
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**By Count**

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<thead>
<tr>
<th>Ayes</th>
<th>Nays</th>
<th>Abstentions</th>
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<tbody>
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