**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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xx. When conducting duct leakage to outside or total leakage tests, the exception in Section 5.2.7 of ANSI / RESNET / ICC 380 related to non-dampered ventilation air openings shall not be used.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*
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301-2025 xx. footnote comment

Commensurate with previous feedback given on this topic years ago, uncontrolled supply-side ventilation should not be attempted to be treated as duct leakage. The reason is simple:

1. These are intentional ventilation openings in a duct system; forcing raters to test a system with a 4” hole then dilutes whatever meaningful information there may be relating to how well sealed the duct system actually is, harming the ability of raters to work productively with HVAC contractors. Writing technical policy that puts raters in situations where they cannot intellectually articulate how well sealed a duct system is because a 4” open hole is forced to be included in a duct test does not help further our craft and adoption in the marketplace.
2. Treating duct leakage as a surrogate for the ventilation load from uncontrolled supply-side ventilation systems only works in two scenarios:
	1. If the fresh air duct contains no damper
	2. If the fresh air duct has a barometric damper and the duct system is depressurized
3. However, it does not work to capture this load:
	1. If the fresh air duct has a barometric damper and the duct system is alternatively pressurized, which is a perfectly acceptable method of testing in 380.
	2. If the fresh air duct has an interlocked mechanical damper that opens when the air handler runs, albeit without the controls necessary to be considered a CFIS system.

I don’t know how else to continue to explain this… an uncontrolled ventilation duct is not a duct leak; it is an intentional opening in the system, meant to bring in fresh air when the air handler runs. Sometimes these are part of a CFIS system; other times they are not.

I understand the Committee does not like that such uncontrolled ventilation systems get installed because they are not controlled ventilation, but regardless, they do in fact get installed, and they are in fact not a duct leak; they are an intentionally installed component of the HVAC system. Duct tightness testing should be quantifying the quality of construction of the duct system (ie, sealing joints, fittings, boot connections, etc).

I also understand that the Committee wishes to capture the energy load from such uncontrolled ventilation systems. Again, you should seek to do so, but you are not ensuring this will occur with the way this is written; a savvy rater will just tell their contractors to install a barometric damper and pressurize the ducts, largely eliminating the impact.

Instead, your Committee must instead create a separate classification of “uncontrolled supply ventilation openings” and an estimated flow should be determined based on duct diameter. This uncontrolled ventilation would not count as part of a whole-house ventilation strategy but rather be an extra energy load. This could be a simple checkbox toggle in the rating software if present. The rater can then uniformly tape off these ducts, to accurately quantify duct tightness and to be able to educate their contractors on how well they are executing on the craftsmanship of duct installation and sealing without a distraction of a 4” hole in the system masking the outcome of the test.

They are two separate things:

* Duct tightness
* Uncontrolled ventilation energy load

You cannot reliably get both at the same time. Please stop trying to kill two birds with one stone because you are actually quantifying neither in a reliable, scientific manner.