



MINUTES

ADVISORY COUNCIL MEETING

Bureau of Electronic and Appliance Repair,
Home Furnishings and Thermal Insulation (BEARHFTI)

Department of Consumer Affairs (DCA)

Hearing Room

1625 North Market Blvd.

Sacramento, CA 95834

April 18, 2013

9:00am - 1:30pm

Attendees:

Council Members:

Sharron Bradley
Neil Puro
Burt Grimes
Walt Bader
Gene Valke
Kathleen Newman
Tim Hawkins
Jim Albers

Bureau Staff:

Tonya Blood, Chief
Carrie Cathalifaud, Laboratory
Karen Skelton, Licensing/Admin
Theresa Berzinas, Enforcement
Said Nurkbash, PhD, Laboratory
Sue Xu, PhD, Laboratory

Public:

Reichel Everhart, DCA Executive Staff
Robert Callahan, Tech America
Emily Pappas, Hewlett-Packard
Virginia Tippey, OMI
Bob Schuenfeld, Interline
Greg Pruden, DCA Legislative & Regulatory Review
John McCormack, Public

I. Welcome and Introductions - Tonya Blood

Chief Blood opened the meeting and welcomed all those attending. The Council Members introduced themselves.

Chief Blood stated that we were conducting a joint meeting of two Councils, both the Electronic and Appliance Repair Council, and Home Furnishings and Thermal Insulation Council, in order to talk about what we have been doing as a consolidated bureau over the last year. She noted that the bureau would like the Council's input on the value of combined vs. separate meetings so we could plan accordingly.

II. 2013-2017 Bureau Strategic Plan

Chief Blood presented the new Strategic Plan, identifying five goals relating to:

- Licensing
- Consumer Protection and Enforcement
- Communication and Education
- Legislation and Regulations
- Organizational Effectiveness

It was asked if the Plan was in its final form, and Chief Blood responded that it was published and in final form and was in place for a 4 year period. She stated that it was also available on the Bureau's web site.

Input was solicited on proposed and potential regulations (Goal 4) that may be needed, or had been overlooked, and also for the Council to help us prioritize, as the regulatory process takes a 1-1/2 to 2 years to put a regulation in place from developing the language to actual adoption.

It was noted that we are currently working on the revision of the Technical Bulletin 117 Standard and to have additional juvenile products exempted.

Council Member Grimes proposed that the Home Furnishings law labels be brought more up-to-date through regulation - some of the issues brought up were:

- Remove revenue stamp
- Remove percentage of materials listed on labels - challenge to be precise because of manufacturing methods - there can be variances
- Variations could result in multiple law labels for each products, or for each product having its own specific label, which is cumbersome to the manufacturer
- Recommend consider labeling similar to food products (highest to lowest item)

Chief Blood asked for comments on the other outlined proposed regulations. She noted that Advertising Guidelines are also a priority. She noted that there was some obsolete regulation on the Electronic and Appliance Repair side (e.g., picture tube grading), and that we would be reviewing for update.

Council Member Hawkins recommended (Electronic and Appliance Repair) that the registration number be displayed in all advertising. Given the migration of business doing mobile repair, the registration is not available for customer view, as it is in a brick and mortar establishment. It was suggested that registration numbers should be placed in all advertisements, including on the service vehicles.

It was also noted that this is an industry-wide issue, and given our current resources, it would help enforcement efforts to have those registrations and licenses displayed.

III. Enforcement/Licensing/Laboratory Activities (See Attachments)

Attachment A - Enforcement Report - Presented by Theresa Berzinas

It was asked if we were using the same staff for Enforcement activities, since we had such an increase in issuance of citations. It was noted that we were using the same number of staff, however we had developed a new process for addressing unlicensed activity by issuing order of abatements, that initially do not have a fine levied. This made it easier to follow up on – and we were gaining swift compliance at a very high rate, without appeal. If there was no compliance, a fee-based citation would be issued or further disciplinary action sought. Chief Blood stated the pilot was for the Electronic and Appliance Repair side, however, given the success, it would be rolled out for the Home Furnishings side in the near future.

It was requested that we update our website regarding the citations, and Chief Blood stated we were currently working on getting the information current on the web site.

Public comment:

Virginia Tippey: Is there a requirement for license number in web sites? It would be helpful for enforcement purposes. Theresa said she would check into it. Council Member Hawkins echoed that it would also be good along with the vehicle signage with the number.

Attachment B - Licensing Report - Presented by Karen Skelton

It was requested that we provide a population comparison for the last 10 years to gauge the numbers for different types of licenses in the industry.

Council Member Bradley asked how we discover and approach companies that are unlicensed, and it was discussed that one of the biggest challenges were people who were transacting via the internet.

Council Member Bader asked how the new influx of licenses and registrations compared with a few years ago. Karen said she would go back and do a comparison of years past to see the trend.

Council Member Bader also asked about the nexus between Enforcement and Licensing to licenses being granted. Karen stated we have to follow the laws and

regulations which outline what we can deny license for and we had to stay within that scope, but we would explore other criteria.

Attachment C - Laboratory Report - Presented by Carrie Cathalifaud

Items noted/discussed

- Council Member Albers stated that he would provide us with some testing they did using light bulbs on cellulose insulation purchased at Home Depot. They had open-flame ignition as a result. Carrie explained that cellulose is ground up newspaper and boric acid and is a blown-in insulation that people use to augment their insulation in their home. Carrie asked him to get the information to us and we would look into it.
- Council Member Bader stated that he had been told that there is a shelf life for boric acid - Carrie noted the bureau had some study information and would share.
- Council Member Bader asked about who had the purview over the chemical content and Chief Blood stated the Department of Toxic Substances Control.
- Council Member Bader asked if someone claimed/advertised a product as 'Chemical Free' – Chief Blood responded that we would have to work with other sources to address/prove there was false advertising.

Public comment:

Virginia Tippey asked if we had a targeted turnaround time to report test results to the manufacturer or retailer. Carrie responded that it is normally 30-45 days, and that we state 60 days on our Product Procurement Form which is given at the time of sampling.

Virginia also asked if we took any chemical toxin data regarding chemical exposure. Carrie responded that we perform standards only and that other state regulatory agencies were involved in the control of what chemicals could be used. Chief Blood reiterated that it is outside the scope of our statutory authority.

Carrie went on to state the Bureau's flammability testing is limited to a product meeting a performance standard - and has no statutory authority over regulation of fire retardants, chemical or toxin exposure - those are regulated under other governmental agencies, such as the Department of Toxic Substances Control

IV. Assembly Bill 1443 - Reimbursement Process

Chief Blood and Carrie presented the process for reimbursement for products taken for sample. Chief Blood informed the committee that laboratory reports were being prepared and will be provided to industry with notice of all flammability failures. Carrie presented a sample laboratory report demonstrating a 'worst case scenario' and noted that normally most products don't have that level of failure. Our turnaround time for testing is normally 30-45 days. It was noted that the law stated the Bureau would pay

“*actual cost*” for the product, so the Bureau was noting retail cost at the time of sampling so that we could gauge if we were being billed appropriately. Actual reimbursement hadn’t begun.

- Council Member Bradley asked what is our current compliance rate for products sampled? About 60%
- Minor label discrepancies (e.g., slight font size, etc.) that are not considered a consumer harm issue would still allow the product to be eligible for reimbursement, if it passed the flammability test. Manufacturers would be notified
- It was asked about the functionality of the laboratory. Carrie advised that the Bureau laboratory is up and running despite a few issues

V. Senate Bill 1576 - Ignition Interlock Devices

Karen provided an update on the law which allows Electronic Service Dealers to install Interlock Ignition Devices in vehicles without having a separate Bureau of Automotive Repair (BAR) registration. The law became effective January 1, 2013 and regulations are in the process of being drafted for both BAR and BEARHFTI to ensure consistency across DCA and to ensure the requirements of the Department of Motor Vehicles and the Office of Traffic Safety were appropriately incorporated.

The Council was informed that a more detailed article is available in the newsletter.

VI. Assembly Bills 1588 and 1904 - Military Legislation

Karen provided an update on two pieces of legislation that provided licensing benefits for active duty military personnel and the spouses or domestic partners of active military personnel.

AB 1588 allows for a waiver of renewal fees for military personnel on active duty while they are serving, with substantiating documentation.

AB 1904 allows licensing applications for spouses and domestic partners of active duty military personnel to be expedited, with substantiating documentation.

Chief Blood mentioned that a military section was created on the Bureau’s website which contained this information. Council members stated they were pleased with having a section dedicated to military personnel.

VII. Return of Replaced Parts (Business & Professions Code 9843)

The Council was provided a list of questions regarding the exemption of returned parts in an effort to determine whether or not the current regulation is an adequate balance of consumer protection and if unduly burdensome to industry to require the return of parts, using the current exemptions.

Council Member Hawkins stated that returning old parts and soliciting a waiver were best practices. There is the issue of what if the replaced part was in fact good, and the repair depot had misdiagnosed the problem?

Public Comments:

Robert Callahan of TechAmerica, represented the members of the Information and Communications Technology (ICT) Industry association, brought forth the following points:

- Manufacturers often contract with third-party companies
- There is not really an opportunity to send all parts back
- Increased mailing costs
- The value of a broken part may be exceeded by mailing costs
- There is not a “discernable” benefit to consumers
- How is an exchange basis defined?
- What is the definition of “sold”
- What makes these items subject to negotiation?
- Value vs “valueless’ parts

It was suggested that Mr. Callahan take a copy of the Council’s questionnaire back to his members for submission as input to the Bureau on this matter.

VIII. Outreach (Newsletter - Guide to Electronic and Appliance Repair)

Chief Blood presented the Bureau’s first Annual Newsletter and the Guide to Electronic and Appliance Repair to the Council. She asked what other outreach materials would be helpful to consumers and industry. The Council members input was as follows:

- Spreading the word through the Council - having them provide links, as appropriate
- Developing Home Furnishings brochures
- Frequently Asked Questions material
- Flammability of “Mattresses”
- Flammability of “Furniture”
- Travel to meet more regularly with industry

IX. Disciplinary Guidelines

Chief Blood deferred this item to the next Council meeting as the Disciplinary Guidelines for both Electronic and Appliance Repair and Home Furnishings and Thermal Insulation are currently under review by the DCA Legal Office. Once the review is complete, they will be shared with the Advisory Council for input.

X. Advisory Council - Appointments and Meetings

Chief Blood stated that all council appointments expire effective July 1, 2013 and clarified that the appointments are made by the DCA Director. She stated that we are also in need of public

members and need the council's assistance in recruiting. The Advisory Council members stated they liked having joint meetings and like to be informed of all Bureau activities.

XI. **Review Public Comment - Technical Bulletin 117-2013**

1. The ASTM procedures should be written into the TB 117-2013 to avoid confusion.
This needs to be specified whether it is the 2004 or 2009 ASTM test
2. The lining used underneath should specify which section of the standard is being met.
Applies to lining vs. slipcover fabrics.
3. The labeling should specify which section of the standard is being met.
Have the cover fabric meet or barrier fabric? The distinction between Class 1 or Class 2 was discussed, and whether or not it was applicable or just 'pass' was sufficient where it didn't specify the class.
4. The Bureau should require manufacturers to fully disclose the materials, components, ingredients, flammability protection designs, FR's used, flammability risks.
Discussion on difficulty of how to verify and that it could possibly infringe on proprietary designs. It was also brought up that there could be off-gassing of materials, however it was noted that even organic materials are subject to off-gassing. It was asked what the flammability risks were.
5. Section 3.3.3 contains a typo - measurement should be '1/2 inch (1.27 cm)" not 1.27mm.
This section needs to be fixed.
6. Section 3 should require the density of the test specimen should be the same as the final product.
This is already required under ATSM standard.
7. Section 3 should provide a procedure for testing loose fills, i.e. shredded foams, loose fill materials, feather and down, polystyrene beads.
All those items are covered. What is the proper way to contain these items? Construction? or Barrier?
8. A smolder-prone cover fabric should be used, not a smolder-resistant fabric in Section 3.
A smolder resistant fabric or barrier is required (refer to Section 3).
9. Section 1.1, paragraph 2, should be amended to accommodate thickness layers less than 2 inches.

OK

10. Item 2 of the Pass/Fail Criteria should be amended to accommodate when cigarettes self-extinguish before burning full-length (i.e. vinyls)

If 3 samples go out = pass

11. A composite test should be added as an option.

No, this is cost-prohibitive

12. The Bureau should consider using ASTM E-1353-08a and NFPA 260 protocols as written.

Pass/Fail criteria is required to regulate

13. Label requirement for COM products should be eliminated, or the use of generic labels should be allowed rather than personalized labels.

Custom Order Manufactured (COM) products. Custom Upholsterers could write on label with indelible ink. Consider having customer sign off as a waiver. Have custom upholsterers treat as Class 1 fabric.

14. If COM fabrics are not exempted entirely, the Bureau should exempt existing patterns at least.

See 13

15. All synthetic fabrics should be exempt from TB 117-2013

No - some synthetic fabrics may not pass

16. The Resilient Filling Materials test requirements in Section 3 should be removed.

These test requirements are essential

17. The test should be stopped 5 minutes after smoldering stops; remove 45 minute duration and use as a maximum time instead.

Combustion can occur after 5 minutes. This appears to be a reasonable time with safety and economical considerations.

18. The cigarette conditioning should be modified to 50 plus or minus 10% relative humidity prior to use.

This is a needless burden

19. There should be a char length measurement on the mockup vs. removing cover materials.

Measure vertical char length as in ASTM on the mockup

20. The draft enclosure should be removed as it limits oxygen supply to the smolder-prone test specimen.

The draft enclosure eliminates free oxygen and does not provide real world scenarios.

21. Mass loss should be used instead of char length measurements - smoldering can progress in any direction.

Mass loss is the scientific way. Remove char length.

22. The standard foam needs additional specs: cell size, strut thickness and length, open vs. closed cell structure.

The Bureau is working with the polyurethane foam association on a standardized foam which is reproducible and reliable

23. An air flow to foam descriptions for standard foam should be added.

See 22

24. The Bureau should allow medical exemptions if requested or authorized by a physician as with mattresses.

The Bureau is reviewing the federal language for incorporation into the standard

25. The ASTM cover fabric test method should be used without changes

OK

26. The test method should include measuring only vertical char length.

OK

27. The RH of 65% or less should be used.

OK - the current standard is 65%

28. The conditioning time should be reduced to 4-6 hours rather than 24 hours.

The Bureau laboratory will look into the effect of this change

29. The Bureau should consider using UFAC standard because of testing burden.

The Bureau is not requiring retest - will accept similar test results

30. The use of equivalent substitutes for SRM 1196 cigarettes should be allowed.

Currently there are the self-extinguishing cigarettes and Pall Mall cigarettes available. Council Member Albers suggested that a soldering iron could be used for testing. The SRM 1196 cigarettes are in the mattress standard. We may need to consider another alternative.

31. Both open flame and smoldering tests should be eliminated so manufacturers can make products with or without FR's if they want.

No. This defeats the purpose of the revision, to still provide safe products.

32. Only those products that largely contain PU foam should be required to meet TB 117-2013, not Non-PU foam products.

This is a performance standard, not a materials standard.

33. The Bureau should allow products to comply with either the old or the new standard.

No, we need to be consistent.

34. The standard must have an open flame test plus full-scale validation.

This is a proposed smoldering test. CPSC is having a workshop on open flame - Tonya and Said will be attending.

35. Section 2 should include an open flame test for barriers in addition to smoldering test.

This is a proposed smoldering test.

36. The word "flammability" should be replaced with "smolder resistance" in Article 13, Section 1374.3 (a) – (b).

See 39

37. The words "fire retardant" and "flame resistant" in Article 13 Section 1370 are misleading since materials are not subject to open flame testing.

See 39

38. A conflict exists with Section 1373.2 and Method Section 3.1 which states that foams are to meet TB 117-2013 (1372.2) and use of non-compliant fills are allowed with use of barriers. Also pertinent to filling materials and core fabrics (1374).

It meets the standard if you use barriers.

39. The proposed labeling language is misleading and does not state that protection is against smoldering ignitions sources only.

Suggestion to label as smoldering

40. The Bureau should withdraw the proposal, or at least postpone until a standard that addresses both smolder and open-flame ignition sources is developed.

The Bureau will continue with the proposed standard and to study barrier materials for open flame ignition.

41. More resources should be placed to support the use of the non-halogenated flame retardants, which do not cause harmful emissions.

The Bureau does not prescribe specific materials. We evaluate based on performance standard.

42. The UK BS 5852 should be evaluated for adoption.

Chief Blood stated she met with Terry Edge of the UK, and he is looking at revising their current standard. Council Member Newman stated she would send information and pictures she has.

43. The Bureau should work with ASTM committee to modify E1353.

We will be incorporating the ASTM standard into the Bureau's standard.

44. The 2002 version of TB 117 should be considered.

This is not a viable option.

45. Barriers can be a key element in reducing upholstered furniture fires. The extra cost of adding barrier is \$10 – 12 per piece of furniture.

This can be an industry voluntary practice - Bob Schuenfeld stated that it would be about \$50 per piece with installation.

46. The Bureau and State Fire Marshall should implement a fire data collection by July 1, 2013 so that a standard can be based on real-world data.

Council Member Albers stated that the current reporting system in place with Fire Marshal does not capture data to a level where it can be correlated to the involvement of furniture in fire deaths. Per Albers the data is available, just not processed correctly. Kathleen asked how would we measure the success?

47. The current TB 117 should remain in effect until the Bureau collects enough real-world fire data.

See 46 - the trend information is broad. The Bureau relied on all available data.

48. The Bureau should follow CPSC's standards development process and evaluate more up-to-date technologies before modifying the current standard - new fire retardant technologies are safe, effective and sustainable.

The Bureau is moving forward with its current proposal but will continue to work closely with CPSC on a national standard.

49. The Bureau should allow 1.5 years (or until January 2015) for the sale of existing inventory.

One year from adoption should be sufficient to clear inventory from manufacturer. Council Member Bradley asked about existing inventory – Chief Blood said existing product will carry old labels concurrently with new product/new labels - the time constraint is on the manufacturer, not the retailer. The Bureau will clarify.

50. Laundry detergent should be specified; larger cover fabric size should be used for better overlap; pins, staples, or clip fasteners should not be used since they may influence results, instead fold and tuck with larger fabric size.

The Bureau will be looking into this.

Seven additional questions that were part of the regulatory comments were presented to the Council.

XII. Public Comments

Bob Schuenfeld stated early in the TB 117-2013 discussion that fires are often a result of the fabric (dust cover) underneath the sofa. The cover can be made of flame resistant fabric and as children often play on the floor this is an inexpensive and effective extra measure for fire safety. It is a viable voluntary extra measure.

Bob also brought up that companies were not notified of required Proposition 65 postings until after the law went into effect and purchases were being made the day after the effective date in order to initiate lawsuits against retailers for failing to have the notifications posted. Over 160 retailers were impacted by these lawsuits. Had there been sufficient notice, the retailers would have had ample opportunity to comply. Bob thanked the Bureau for its efforts in getting information out on our website promptly after he contacted us. In response to question #4 he brought up that “ingredients” on the Proposition 65 list were subject to change.

Virginia Tippey commented on the following issues:

The Prop 65 issue will continue to become an issue.

Disclosure of the license number on web sites would be valuable to consumers.

In comment to the TB 117-2013 recommendations:

#24 - Agreed that the consumer should have the right to opt out of chemicals in their furniture, but said that it should not necessarily require a doctor’s prescription.

#20 - The draft enclosure is not representative of products in a household - it becomes a test of the laboratory, not the household fire situation.

#15 - There are a number of highly flammable synthetics.

3-4 - This hedges on the proprietary information. The manufacturer should be able to build the problem to meet the standard. There would be challenges in disclosure of ingredients. The disclosure does not mean they pass - the test means they passed.

XIII. Adjournment

Attachment 1

Bureau of Electronic & Appliance Repair, Home Furnishings & Thermal Insulation

ENFORCEMENT UNIT

The Enforcement Unit is comprised of:

- Field Operations
- Compliance Unit

First Quarter Data

Year	Complaints	Investigations	Citations
2011	486	497	12
2012	429	468	41
2013	542	540	192

Complaints & Investigations:

As demonstrated above, the Enforcement Unit is receiving and investigating more cases in the first quarter of this year than in the past two years. This includes complaints received by the Bureau and through DCA's Consumer Complaint Unit.

Citations: (Addressing Unlicensed Activities – Electronic and Appliance Repair)

The most significant impact has been in the number of citations that have been issued due to recently implemented procedures. These procedures include the issuance of abatement only (we refer to as "0" dollar) citations upon first contact with unlicensed businesses.

These abatement only citations are being utilized as a tool to educate and inform business owners of the laws and regulations of the Bureau, while ensuring compliance. The abatement is the requirement that the business owner/operator apply and receive a registration; therefore, allowing them to lawfully operate in the state of California.

Since February 2013, these abatement only citations have created 95 new BEAR registrants. The same process will be implemented on the BHFTI side in the coming months.

Disciplinary Actions:

The Bureau currently has 17 cases pending at the Attorney General's Office for the filing of disciplinary actions. These actions are primarily comprised of cases in which an applicant has been denied a license or registration and they are seeking a probationary license/registration. The process involves the state's Attorney General's Office and holding of a hearing before the Office of Administrative Hearings. The Bureau has been implementing internal procedures to improve communication between these entities to assist in reducing the processing timeframes.

Probation Program:

During Fiscal Year 2011/2012, the Bureau revised the process on how it had been monitoring its licensees/registrants that have been granted probationary licenses. The Bureau currently has 11 probationers, who are each serving a 3-year probation term.

The standards terms and conditions of probation include an orientation interview with a Bureau representative in attendance with the probationer. The purpose of these interviews are to review the terms and conditions of the licensee/registrants' decision and order, and outline the expectations of the probationer and the Bureau.

The Bureau has also implemented random site visits for the purpose of auditing the probationer's business practices to ensure compliance to the terms and conditions of their probation.

Attachment 2

Licensing

- We are in the process of updating all of our applications, and will be publishing the new ones in May
- We have implemented online renewal via credit card for certain registration and license types
- We are currently staying well within the 30 day timeline to process complete applications
- We are issuing an average of 350-400 new registrations and licenses each month
- For the most part, registration/licensing populations are remaining steady, with a continued increase in service contract seller registrations
- We are requesting updated company information and sample contracts from our service contract sellers that have been with us for awhile – in the process we have discovered:
 - A new administrator
 - Contracts that are being sold that are obsolete (e.g. the 3rd party obligor had changed)
 - Contracts that had not been filed with the bureau
 - Changes in business structure/corporate officers, changes of ownership, etc.
- We have also been working more closely with major retailers to streamline their application and renewal processes

ADVISORY COUNCIL MEETING- LABORATORY ACTIVITIES REPORT

- **The laboratory staff successfully moved our lab to the new facility in April, 2012. The date of the move continued to be pushed out which made it difficult for planning and executing. The new facility took about 4 years of planning before the move actually took place. The new facility offers better testing accommodations, safer location, closer to DCA HDQ's, the common areas and laboratory are now meeting SFM codes and OSHA requirements where we were deficient in the old facility. Currently we are still working thru some issues- conditioning room requirements and the burn room exhaust system.**
- **Due to our work towards the new draft proposed flammability standard, TB117-2013, the laboratory staff is focusing more on bedding products such as comforters, pillows, mattresses, futons, etc.**
- **We are gearing up for the two-year study on fire-barriers and new technologies to examine the open flame fire resistant properties, look at cost effectiveness and determine their applicability to open flame tests in residential upholstered furniture. We will work with other government agencies and interested stakeholders.**
- **Created a process for notification for reimbursement and non-reimbursement for products secured for testing and a format for detailed test reports for non-compliant products which will be forwarded to our compliance unit so they may provide this information to the manufacturer of the non-compliant product.**
- **BEARHFTI is in the process of updating the Thermal Insulation Regulations (located in the California Building Standards Administrative Code, C.C.R, Title 24, Part 12, Chapter 12-13, Standards for Insulation Material). A workshop is scheduled for June 20, 2013 at DCA HDQ's from 9 to 1:00pm. Here we will discuss changes and additions to the thermal insulation regulations. A draft of the regulations should be posted out on our BHFTI website sometime in Mid May. The regulation change is necessary to accommodate new types of products in the insulation industry and update outdated information. This change will benefit the insulation industry, building officials and the consumer.**

STATISTICS

- **Total Samples:**

FY 07/08 – 984 TB117 pass rate=60%, Plumage pass rate=70%, 1633 pass rate=85%, Insulation pass rate=100%

FY 08/09 – 687

FY 09/10 – 553

FY 10/11 – 292 TB117 pass rate=65%, Plumage pass rate=45%, 1633 pass rate=85%, Insulation pass rate=85%

FY 11/12 – 309 TB117 pass rate=50%, Plumage pass rate=40%, 1633 pass rate=85%, Insulation pass rate=90%

Domestic Vs. Imports

FY 07/08 – Domestic 65%pass, 35%fail (based on 265 samples)

Imports 55%pass, 45%fail (based on 377samples)

FY 09/10 – Domestic 70%pass, 30%fail (based on 252 samples)

Imports 70%pass, 30%fail (based on 243 samples)

FY 10/11 - Domestic 80%pass, 20%fail (based on 182 samples)

Imports 60%pass, 40%fail (based on 090 samples)