

Comments received on Verification tolerances and indicative benchmarks on 13-2-2015

Dear Mr. Van den Boorn,

Issue

Verification procedure for the market surveillance purpose (Annex III, CR (EU) No 327/2011)

The verification tolerance of the surveyed model is proposed to be changed from 0.9 to 0.93.

Position of TLT-Turbo

Supplementary to the arguments of Soler & Palau Research S.L.U. we like to state the following:

Realistic technical considerations have also to take into account the verification measurements/possibilities for bigger, customer process tailored, high quality/performance fans which we (TLT-Turbo) typically supply. These non-serial, small quantity fans will be finally assembled on site and always be measured being already built in typically complex facilities like street tunnels etc. and not in test stands. Against this background, the number of 0.9, as being part of Annex III of the existing Regulation, was and is already a strong, challenging requirement.

Therefore, we urgently ask for staying with 0.9.

Issue

Indicative Benchmarks (Annex IV, CR (EU) No 327/2011)

Position of TLT-Turbo

The efficiency grades (indicative benchmarks) as listed in Table 1 of ANNEX IV should not be changed/exceeded (maybe with the exception of cross flow fans). They should represent the maximum values for efficiency grades of different types of fans in connection with revision considerations of the Regulation.

Furthermore, from our point of view, the following remark in ANNEX IV still holds: "These benchmarks may not always be achievable in all applications or for full power range covered by the Regulation".

Mit freundlichen Grüßen, Best regards

Dr.-Ing. Dieter Holzdeppe
TLT-Turbo GmbH