

From: Todd Bergstrom [mailto:tbergstrom@afmcorporation.com]

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Subject: Proposed Revisions to the Acceptance Criteria for Termite-resistant Foam Plastics

I am writing with a comment on the proposed revision to AC239. The revisions in general are providing an alternate method for approval of these products. It is important that the 3 year in ground testing be conducted and the proposed revisions still maintain this requirement.

I do believe that the requirements for the laboratory testing need to be expanded. As is done currently in Section 4.3.3, testing must be compared to control samples to demonstrate that the test program is sufficiently severe to demonstrate a difference between non termite resistant foam plastics and termite resistant foam plastics. I would suggest that the sentence "The results from control samples of untreated foam plastic shall be compared to the results for termite-resistant foam plastic." be added to the proposed Section 4.3.3.1 to ensure that the laboratory testing can distinguish between these products.

Thanks for your work on this important AC.

Regards,
Todd Bergstrom, Ph.D.
V.P. Technology
AFM Corporation
211 S River Ridge Circle, #102
Burnsville, MN 55337
(952)474-0809 phone
(952)474-2074 fax