

# Randy Kim

DENSO Products and Services Americas, Inc. (DENSO) is a manufacturer of portable air conditioners used primarily in commercial and industrial applications.

DENSO is pleased to submit the following informal comments concerning a rulemaking and to amend the draft language, specifically for those pertaining to Chapter 173-443-075.

## Request

We would like to request removing the word "rented" from the below Sell Through Provision as currently drafted, which states that:

Air conditioning equipment that is manufactured prior to Jan. 1, 2024, may be solely leased, rented, installed, or otherwise introduced into Washington commerce on January 1, 2026.

## Background

We have less than a year remaining in the Sell Through Provision, whereas our rental distributors in the state of Washington are continuing to build fleets to sustain business growth and continue to increase revenues. We are continuing to serve demands and fulfilling orders for our rental distributors with our portable air conditioners produced prior to Jan. 1, 2024, during the current sell-through provision.

If the sell-through cutoff is applied to the rental of portable air conditioning equipment that includes those existing rental fleets, this would have a devastating impact on our rental distributors in the state of Washington. The new orders that our rental distributors have issued and the shipment that they are receiving during the current sell-through provision will not be allowed to be used for rental business starting in January 2026, along with the existing fleets of hundreds, if not thousands, of rental units that they depend on for their livelihood of business for the past decades. Therefore, it is essential that the rental of equipment to be removed from the sell-through provision.

We sincerely appreciate the opportunity to participate and to provide informal comments on the subject matter.

Respectfully,

Randy Kim  
Senior Product Specialist  
DENSO Products and Services Americas, Inc.