

## Letter was unjustified attack on association

CHATTANOOGA, TENN. — The letter, which appears in the May 2008 issue of your magazine (*May pg. 31*), is a direct, wholly unjustified attack on the Cast Iron Soil Pipe Institute, which has been a reliable source of information on cast iron soil pipe and fittings for the past 59 years.

It is clear to me that the authors of the letter and your editors did not verify their facts before printing the letter and disparaging the good name of an association that has supported the plumbing industry and promoted cast iron soil pipe and fittings for the benefit of the very people who have chosen to attack our association.

I have been attending code and standard-writing meetings for this industry for 25 years. The authors of the letter are unknown to me. To my knowledge, they have never attended a single standard meeting or code proceeding for the products and standards for which they claim compliance. When it comes to industry standards for our products, I respectfully suggest that the authors of the letter simply don't know what they are talking about.

Their statements relating to formal acceptance of their products by "a multitude of jurisdictions" and "thousands more jurisdictions of a third party certification agency" are wrong. The reason is simple. Jurisdictions do not accept, approve, or endorse individual sellers or manufacturers of products. Nor do standards setting bodies such as ASTM and the model plumbing

codes. Products (not sellers or manufacturers) complying with the product standards referenced in the code are acceptable in individual states and locales, but they do not go through some sort of acceptance procedure other than inspection in the field on

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an installed basis. Nowhere in any plumbing code is there a list of accepted manufacturers or sellers. Moreover, in at least two recent instances where importers have gone outside the customary process and sought approval from a government agency or jurisdiction, they have failed.

Their statements relating to "third party certification agencies" are also wrong. Nowhere in the ASTM or CISPI standards for cast iron soil pipe and fittings is there a provision for "third party certifications." The only entity that can certify conformance of products to the cast iron soil pipe and fittings standards is the manufacturer. The word "manufacturer" is defined in both standards as "the entity that casts the pipes and fittings." The writers of the letter are not the manufacturers but the purchasers and resellers of products other manufacturers have produced overseas. Moreover, the resellers use multiple foundries to cobble together their product offering, which makes any quality

assurance process that much more difficult.

The claim that the products sold by Matco have been accepted everywhere is also not true. Tellingly, in the midst of repeated statements about all they say they do to ensure production of a quality prod-

uct, the letter's authors fail to inform readers that Matco requested approval of the products it sells in Michigan and Kentucky. Matco was denied approval in both states because of their inability to provide adequate test reports proving compliance of their imported products with applicable standards.

Lastly, Matco chooses to attack ads being placed by CISPI that simply point out what occurred in the course of the protracted inquiry into the compliance of certain imported pipe and fitting products with applicable standards by the State of Michigan. Domestic manufacturers demonstrate compliance to customers and field inspectors every day all across the country. But when the Michigan applicants sought to satisfy regulators in just two focused inquiries that the applicants themselves instigated, they failed. CISPI is not out to say something disparaging about imported products; it simply wants a level playing field where products that must

meet applicable standards can, in fact, be shown to meet those standards. Nothing more, nothing less. There is nothing unfair or anticompetitive about expecting imported products to be able to meet the same burden on this point that domestic products successfully meet everyday.

And when it comes to a level playing field, we have not even begun to point to the fact that importers are choosing to buy from Chinese pipe and fitting producers who operate without adequate environmental or safety controls and who benefit from artificial exchange rate and export subsidy protections that give them an unfair advantage over U.S. producers. It's little wonder so many of our American manufacturing jobs have been shipped overseas.

The letter sent by Mr. McVay and Mr. Matz is simply a self-serving attempt to support their sales efforts and provide inaccurate information on the products they sell to the readers who are not aware of the facts. Their attacks on the very people that work to promote the use of cast iron soil pipes and fittings, whether foreign or domestic in the United States, is at best short sighted and at worst untrue.

Letters with unsubstantiated or factually wrong information do not help the industry or the reputation of any respected trade association and its members.

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