



MW Manufacturers Inc.
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WINDOWS & DOORS

Mr. Richard Karney
Department of Energy
ENERGY STAR Window Program
Fax: (202) 586-4617

March 25, 2003

Re: ENERGY STAR Window Proposed Revisions

Dear Mr. Karney;

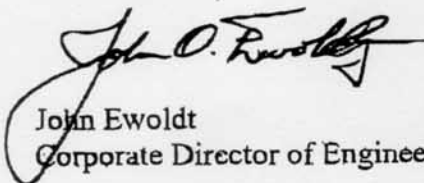
I am the Corporate Director of Engineering of MW Manufacturers in Rocky Mount, VA. MW Manufacturers is one of the top window and door manufacturers on the East Coast.

I wish to express our concern regarding the Department of Energy's February 11, 2003 Energy Star proposal for Windows, Doors, and Skylights program. As a window manufacturer who handles both pyrolytic and sputtered products, I recommend the Department of Energy implement the 4-zone proposal.

Under the 4-zone proposal, we will be able to continue using both types of low-E glazing (hard coat and soft coat) for our customers, as opposed to the 3-zone proposal, which greatly reduces our manufacturing flexibility. The 4-zone map gives a better separation of climate zones, such that Rocky Mount, VA and Dallas, TX are in different *ENERGY STAR* zones. The 3-zone map lumps these cities in the same zone, which is unrealistic as they have drastically different climates. Most importantly, the 4-zone proposal saves more energy overall, which is good for the consumer too. As a window manufacturer, the 4-zone proposal would be a simple change for us in terms of re-labeling *ENERGY STAR* windows.

The 4-zone proposal is better for the industry, the consumers, and the environment. Based on the above, MW Windows and Doors strongly opposes the 3-zone proposal and recommends adoption of the 4-zone proposal as it will save more energy and keep a high performing, energy efficient technology in the market. Thank you for your consideration.

Sincerely,



John Ewoldt
Corporate Director of Engineering

Cc: Virgil Goode, Jr - Congressman Virginia 5th District
Senator George Allen
Senator John W. Warner