

# Sika Sarnafil Inc.

*World Class Roofing and Waterproofing*

March 25, 2007

Dear Ms. Duff,

Thank you for the opportunity to comment on the latest draft of the Energy Star Roof Products program.

We disagree with the decision to omit an emissivity requirement in the latest draft. Although reflective roof materials are beneficial to varying degrees in all climates, their benefits are greatest in warmer climates. In such climates, a low emissivity material will significantly reduce the energy savings potential of the reflective roofing surface. In cooler climates, a higher emissivity may result in a slight heating penalty in non-insulated and/or non conditioned (cooled) spaces. However on typical buildings which are both heated and cooled, the impact of a high emissivity reflective material is likely to be neutral at worse.

The proposal to develop regional criteria may over time lead to the best solution. However, in the short term, in cooling dominated climates, where reflective materials can have the greatest impact on energy consumption, the lack of an emissivity requirement will result in un-necessary energy wastage.

Additionally, the requirement of a minimum emissivity level and/or a minimum solar reflective index, would make the Energy Star program more consistent with the other most common programs, and minimize confusion for consumers.

We are agreeable to allowing this letter to be posted on the Web Site.

Best regards  
Sika Sarnafil Inc.

S.P. Graveline  
Vice President Technical Services



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