

From: lgeorge@archaluminum.net
To: Richard.Karney@ee.doe.gov
Sent: 03/25/2003 08:36 AM

Subject: Energy Star Window Proposed Revisions

Dear Mr. Karney,

I am the Branch Manager of Arch Aluminum in Phoenix, Az. This letter represents the position of the 88 Managers and employees at this branch. Arch, a multi-branch national company, is one of the largest fabricator and supplier of glass products to the US construction market. As a major supplier of glass products (pyrolytic and sputtered Low-E products) to the residential window manufacturers, we have a significant interest in the outcome of the ENERGY STAR program. Based on our experience in handling pyrolytic and sputtered Low-E products, Arch Aluminum strongly recommends the following:

ADOPT THE 4 ZONE PROPOSAL AND REJECT THE 3 ZONE PROPOSAL

Based on the information presented in DOE's analysis, the 4-zone proposal:

...Maintains competition within the glass industry for different types of energy efficient Low-E products. This is good for the marketplace and the economy.

...Maintains a marketplace for pyrolytic Low-E products. Pyrolytic Low-E is processed comparable to standard float glass products which improves the efficiency and cost of our operations. In contrast, Arch incurs significant internal costs for handling sputtered Low-E products. These costs include equipment upgrades, employee training and specialized handling equipment for processing the sensitive coatings. The costs also include material waste due to the short shelf life of the sputtered Low-E products and quality rejects and remakes due to the sensitive coating.

Maintaining a market for pyrolytic Low-E products has a cost benefit to the industry and encourages continued investment to advance this technology. This is good for the consumer, the environment, and the economy.

...Saves more energy. This has a direct benefit to the consumer and the environment.

Based on the above and our position in the residential window industry, Arch/Phoenix recommends the adoption of the 4-zone proposal.

Sincerely,
Les George
Branch Manager

cc: Senator Jon Kyl
 Senator John McCain