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September 21, 2012

TO: Doug Anderson  
ENERGY STAR Home Improvement Program  
Environmental Protection Agency  
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On behalf of Associated Materials, LLC (AMI), we would like to thank you for giving us the opportunity to offer our recommendations for the ENERGY STAR® V6.0 changes. Associated Materials continues to be committed to providing energy efficient products and services. Partnering with the Environmental Protection Agency (EPA) allows us to extend the reach of AMI's products and brands in cooperation with the ENERGY STAR brand.

Below you will find Associated Materials' recommendations regarding the Windows, Doors and Skylights V6.0 proposed program changes as reviewed at the August 27, 2012 Stakeholder Meeting.

#### **PAYBACK PERIOD RAISES BUSINESS RISK AND DEVELOPMENT CHALLENGE**

We continue to be concerned about the affordability of Energy Star qualified windows and acceptance in the marketplace. Your resources have estimated a mean simple payback period of 13 years for the nation and 14 and 16 years in the Northern and Northern Central zones, respectively. Extending the payback period for these products beyond 5-7 years is not within the expectations or means of most consumers. Additionally, the achievement of V6.0 criteria in the Northern zone requires significant product chassis redesign and IG spacer retooling in many companies. Investments for these product redesigns and acceptance in the marketplace are significant risks to our business in a very challenging economy, especially considering that these paybacks are longer than any prior Energy Star for Windows revision. Further, there is significantly higher risk and unpredictability that consumers will migrate to V6.0 products than in any other prior program revision, especially without the tax incentive that was present during the 2010 Energy Star change.

This raises the risk to our business of being able to recoup the investments required to meet V6.0. We estimate the investment for V6.0 to be much higher than what it took to achieve the prior Energy Star revision in the Northern zone. Businesses like ours will need time to skillfully plan design changes and shop floor investments to bring the greatest value to consumers and to the business. Therefore, we request that you consider a longer timeline as below to implement these changes so that they can be developed as part of the business's longer term planning horizons and cash outlays.

#### **IMPLEMENTATION TIMELINE**

Associated Materials strongly suggests the EPA carefully examine and consider the fragile U.S. economy before imposing criteria that would require capital investments that neither homeowners nor manufacturers can bear without further risking the loss of American jobs. The aggressive timeline which provides less than one year after final criteria to meet program requirements by January, 2014 is neither reasonable nor feasible with the risk to companies in this economy and the unpredictability of acceptance of these longer paybacks.

AMI suggests that a minimum of 24-36 months be provided from publishing final performance criteria until marketplace launch. This will allow companies adequate time to strategically evaluate their product designs, optimizing product cost impact and investment levels through the various ranges of product changes that can

meet these criteria. Another goal of businesses would be to design solutions that meet V6.0 without the costly use of a third pane or the use of 4<sup>th</sup> surface coatings. This proposed design period would include time to thermally optimize dual pane designs and avoid moving to triple panes in the interest of providing better economics to the consumer.

### **AIR LEAKAGE**

Any air leakage requirement should be labeled on our products as pass/fail only.

Air leakage is highly dependent on proper installation practices by trained installers. The best performing windows will be ineffective in the hands of an unqualified installer. Air leakage performance is also inconsistent and difficult to duplicate in a laboratory environment. We strongly believe that any communication to the consumer has to be clearly understandable and not encumbered by jargon or difficult to understand concepts. Doing so would confuse the customer as they attempt to select the right product.

We are also requesting that these air leakage labeling requirements be made consistent with any NFRC labeling requirements.

### **INSTALLATION INSTRUCTIONS**

Associated Materials agrees and supports the EPA direction to place installation instructions online for consumers and installers.

Again, we want to convey our appreciation for the opportunity the EPA has created to promote industry and government cooperation in creating economical, energy saving solutions for our consumers.

Sincerely,

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