



**KINCO** LTD.

MANUFACTURER OF ALUMINUM WINDOWS AND DOORS

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March 20, 2003

***IMMEDIATE ATTENTION REQUESTED  
DOE must be contacted by March 26, 2003***

Honorable Bob Graham  
524 Hart Office Building  
Washington, DC 20510

Dear Senator Graham,

**DEPARTMENT OF ENERGY  
AGAIN Issuing Policies Without Considering ALL the Facts  
ENERGY STAR PROGRAM**

With the help of the Florida congressional team last year, the DOE put a hold on this program with the understanding that they would look into the items mentioned in the attached letter sent to them by our congressional team. If they did, it is not apparent in that they are back again with essentially the same proposal. They are still controlled by the vinyl industry, an industry that does not support the Florida New Home Construction Market.

We need your help to

- Protect home owners in Florida with reliable products that meet the New Florida Building Code
- Provide the best products for Life Safety considerations, and have long term durability,
- Prevent long term environmental issues (Vinyl products can create serious disposal issues due to Chlorine content) (Also to explore whether vinyl is more susceptible than aluminum to mold growth),
- Protect an industry in Florida that employs thousands of people throughout the entire State of Florida.

A small change in the requested performance standards will still accomplish the essentially all of the results requested by the DOE and still meet the needs of Florida.

Again, thank you for your help.

Sincerely,

John P. O'Connell

September 21, 2001

Reference:

**Department of Energy**

**"Again in an area that they know nothing about"**

The Problem:

- The DOE has been trying to develop a program to improve energy efficiency in windows in the country without getting input from all segments of the window industry (The southeast region of the United States including Florida).
- One industry group (Vinyl and Wood Window Manufactures) is also controlling the DOE at the expenses of another (Aluminum Window Manufactures).

What have they not considered?

- In the south, particularly Florida, 90% of the new home are being built with Aluminum Windows.
- No consideration has been given to balancing the structural requirements necessary to resist the high wind load particularly Hurricanes, against the desire to improve energy efficiency.
- The State of Florida has a new Building Code coming into effect on January 1, 2002.
- The effect on the Aluminum Windows Market and producers in Florida. The Aluminum Windows Manufactures employ over 3,000 people through Florida.
- The Architectural Manufactures Association of Florida which represents Wood, Vinyl and Aluminum Window Manufactures has been working with the Efficient Windows Collaborative (a DOE sponsored organization) and the Alliance to Save Energy to develop a program to meet the energy, structural and new building code needs of Florida.
- That the new standards could easily raise the cost of a new entry level home by hundreds if not thousands of dollars.
- They have ignored the Solar Heating Factor (SHGC) which in reality measures the energy efficiency in the State of Florida.
- The International Energy Code states that a U Factor of twice that proposed by the DOE is acceptable for an energy efficient home in Florida and a U Factor of 2.5 times that proposed by the DOE is acceptable for a Energy Efficient commercial building. When a detailed educated analysis is performed on this issue, as it was when the above code was developed, it is obvious that there are regional considerations that must be addressed.

What is the DOE proposing to do?

- They want to issue a new Heat Transfer Standard (U-Factor)
- They based this new standard on the recommendations of the Vinyl and Wood Industry
- Assumes that all of the United States should be treated the same
- Ignores the difference between areas of the country where the impact of sun is more important to energy conservation than the temperature of the outside air versus the temperature in a home.

What can you do?

- Get the DOE out of something they appear to not know anything about.
- Stop the DOE from representing one business market over another.

KINCO Ltd. is 30-year old Florida Company that provides windows and doors to home-builders throughout the state. We have offices from Jacksonville to Miami to Ft. Myers to Tallahassee and many points in between.

Thank you in advance for your help.

Sincerely,

John P. O'Connell  
Chief Operating Officer