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March 26, 2003

Mr. Richard H. Karney, P.E., Manager
Energy Star Program
Building Technologies Program
Department of Energy
Washington, DC 20685

Dear Mr. Karney:

This letter is in response to your February 11th request for comments on potential revisions to the Energy Star criteria for windows, doors and skylights.

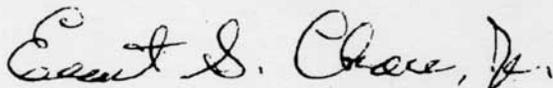
As a partner in the Energy Star window program, we have a vested interest in promoting and selling energy efficient products. Thank you for the opportunity to comment on the two proposed revisions to the Energy Star window program.

As a significant manufacturer of window products sold throughout this country, Schüco Homecraft, L.P. strongly supports the three-zone alternative as the new criteria for the Energy Star window program. From a manufacturing and marketing standpoint, we favor the relative simplicity of three zones instead of four. Also, the informed consumer increasingly demands windows that both insulate well and reduce summer cooling costs. As the Department of Energy analysis points out, these properties are best captured in the three-zone alternative.

We believe that the criteria should meet or exceed the IECC while working within the existing Energy Star windows Northern, Central and Southern zones framework. Your new three-zone alternative comes nearer to accomplishing this goal than the four-zone alternative.

I urge you to adopt the three-zone alternative as the new standard for the Energy Star windows program.

Sincerely,



Ernest S. Chace, Jr.
Quality Control Manager

cc: Michael Trekowal, President