

March 27, 2003

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

Dear Mr. Karney:

This responds to your February 11th letter requesting comments on potential revisions to the Energy Star criteria for windows, doors and skylights.

As a large manufacturer of window products, Vinyl Tech strongly supports the three zone alternative as new criteria for the Energy Star windows program. From a manufacturing and marketing standpoint, we favor the relative simplicity of three zones instead of four. Also, informed consumers increasingly demand windows that both insulate well and reduce summer cooling requirements. As the Department of Energy analysis points out, these properties are best captured in the three -zone alternative.

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

Sincerely,



Paul Baker
President