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Subject: Energy Star Proposals

WDMA Public Comment:

The Technical Review Board and Building Code & Regulatory committees for the Window and Door Manufacturer's Association endorse the selection of the three-zone Energy Star alternative proposed by the US DOE. This endorsement is a consensus of the committees charged with developing technical direction for the association, and represents a clear majority of those companies participating on those committees. Below I have outlined some of the supporting reasons for the consensus opinion in favor of the three-zone alternative.

- Simplest option for manufacturers, architects, builders and consumers
- Reduced peak load demand
- Improved comfort in the North Central region
- Reduced equipment costs to builders through reductions in equipment size
- Clarity in interpretation and enforcement

Some of the comments we received during our review and analysis supported the three-zone proposal but expressed some concerns with particular aspects. Those concerns are listed below:

- The timetable for the proposed change is too short, creating issues with labeling and customer education as well as product literature and other materials.
- The simplified three-zone program should eliminate the need to require the Energy Star map as part of product labels.
- Care should be taken to rate the entire building under the program - not particular components when the entire structure does not necessarily conform to Energy Star requirements.
- Door distributors or jobbers who perform final assembly of entry door products may not always have the infrastructure to certify door assemblies to NFRC procedures. Consideration should be given within the NFRC and Energy Star procedures to the supply chain issues specific to entry door systems.

WDMA also received a number of comments supporting the four-zone alternative. While clearly in the minority, some respondents raised important considerations. Below are a few of the minority opinions:

- Three-zone requirements would result in loss of market for "hard-coat" or pyrolytic Low-E glazing products, (also referred to as high solar heat gain Low-E products) resulting in a less competitive marketplace.
- Three-zone proposal reduces only peak demand energy consumption, while overall energy use would be higher.
- Four-zone alternative results in substantially lower heating costs, a factor that is more important to consumers.

In closing- the WDMA Technical Review Board supports the three-zone alternative as proposed by the DOE, and hopes that all of the points above are considering during review of public comments. Thank you for the opportunity to participate in the Energy Star comment process. We have encouraged our members to file their own opinions as well.

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