

From: MikeTurner@ykk-api.com
To: richard.karney@ee.doe.gov
Sent: 03/28/2003 02:29 PM

Subject: 2003 Energy Star Proposal

Dear Mr. Karney,

My name is Michael Turner at YKK AP America Inc. YKK AP America Inc. (YKK API) is located in Atlanta, Georgia and we conduct business throughout the USA. Our business is in the manufacturing of aluminum fenestration systems.

I am writing to you regarding the proposed action by the Department of Energy (DOE) to set Energy Star standards for windows. As these 2003 standards are currently proposed, they will have a significant adverse impact on my business and other businesses like mine. What is so disturbing about the proposal is that it will penalize window products that save as much or even more energy than windows that are given the Energy Star designation. This result makes no sense to me and it appears to be based on a design specification that favors one type of product over another.

Aluminum windows are more durable than vinyl or wood. Therefore, over the life of the window energy savings will be retained, while deformation in other products will lead to air leaks. This deformation experienced by other products can cause an additional energy consumption in the real life arena as opposed to the initial and controlled results conducted within a test laboratory. Aluminum windows are also much more resistant to storm damage and offer lifecycle environmental benefits over vinyl windows.

I urge you to adopt a performance-based approach for window products, as DOE has done in 32 other Energy Star standards. If we can be of assistance to you in this approach, please contact us.

I look forward to your response.

Sincerely,
YKK AP America Inc.

Michael L. Turner
Manager, Technical Administration
AAMA / NFRC Corporate Representative

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