

March 10, 2015

Mr. Doug Anderson
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Mr. Brian Booher
D&R International, Ltd.
1300 Spring Street, Suite 500
Silver Spring, Maryland 20910

Re: ENERGY STAR for Windows, Doors, and Skylights

On behalf of AAMA and our members, thank you for sponsoring the stakeholders meeting on December 12 and for the opportunity to comment on the future of the ENERGY STAR program for windows, doors and skylights. We appreciate and respect that EPA is committed to maintaining a rigorous and effective dialogue with all stakeholders in the development of V7.0. We, therefore, submit the following for your consideration.

Reliable Market Data:

During the stakeholder meeting, there was discussion about the data sources EPA utilizes for criteria evaluation. AAMA is very interested in helping EPA obtain market data that is both useful to EPA and protects manufacturer confidentiality. AAMA will continue to explore alternatives and we are willing to work with EPA to develop a solution that is reliable for all interested parties.

Replacement of Poor Performing Products in Existing Buildings:

AAMA and our members remain steadfast in our commitment to ensuring that energy-efficient fenestration is available to all consumers so they can enjoy the benefit of reduced energy bills. According to the ENERGY STAR website, EPA estimates that a typical household will save between \$101 and \$538 per year by replacing single-pane windows with ENERGY STAR certified products. It is, therefore, AAMA's position that the ENERGY STAR program should be enhanced to aggressively promote and incentivize the replacement of the estimated one billion single pane products that remain in use in homes across the USA.

http://www.energystar.gov/index.cfm?c=windows_doors.pr_benefits

Fenestration manufacturers and EPA share the goal of reducing energy consumption. Window, door and skylight products have historically been at the forefront of technological advances that were instrumental in reducing energy consumption in new homes. AAMA encourages EPA to now employ the same vast resources that compelled the development of these technologically advanced products, along with its relationship with the Department of Energy, to promote the replacement of aged and under-performing products in existing buildings.

Replacing poor performing products with existing, reliable technologies will also help create jobs to further stimulate the on-going economic recovery. Existing technologies are also more affordable and will help provide favorable payback periods for consumers.

Criteria Revision Cycle:

AAMA encourages EPA to consider establishing a fixed cycle for criteria revisions. While revisions are necessary, frequent and irregular revisions create significant burdens to industry and make it difficult to manage long-range business plans. AAMA suggests that EPA consider establishing a consistent revision cycle of at least five (5) years. This will provide industry with consistency and stability that could foster more effective technology enhancements.

Harmonization with Canadian ENERGY STAR:

AAMA encourages EPA to continue efforts with NRCan to harmonize the two programs. Having a single ENERGY STAR program for both countries would be beneficial to all involved by aligning revision cycles, possible simplification through reduction of the number of climate zones, and consistent messaging for manufacturers who conduct business in both countries and for consumers who reside near the border.

A specific example of where this would have been beneficial is the recent launch of V6.0 in the USA and the Canadian 2015 version. These two programs were launched within one month of each other. Had the two programs been launched simultaneously, many stakeholders could have avoided the time and expense of multiple changeovers.

Structural Requirements:

AAMA reiterates its position that a minimum structural requirement aligning with current International Residential Code (IRC) requirements should be added to the criteria. The current network of test laboratories is fully equipped to provide the necessary testing services. Adding a structural requirement would also provide more consistency with the Most Efficient Program.

Products Installed at High-Altitude:

AAMA reiterates its 2009 request to allow a U-factor increase for high altitude applications (where a capillary tube may negate the thermal performance improvements provided by inert gas fill). U.S. population statistics indicate that 21 million people (a significant market share) reside in high-altitude areas. It is imperative to recognize that without this recommended allowance, the variety of ENERGY STAR-certified products available to the consumer in these areas will be limited.

Impact-Resistant Products:

Windborne debris regions now extend from New England to the Gulf Coast and continue to grow and encompass more single-family homes. Additionally, high-performance, impact-resistant products are becoming the choice when fenestration purchases are based on security and safety of non-coastal property in areas prone to tornadoes. AAMA requests that EPA reconsider its decision to exclude development of separate criteria for this emerging and necessary product offering. Without these separate criteria, the variety of ENERGY STAR-certified products available to the consumer in these areas will be limited.

Daylighting:

AAMA supports the EPA's determination to exclude Visible Transmittance (VT) in V6.0. However, it is important that EPA retain VT on the list for future consideration for applicable products as the industry develops credible criteria. The energy savings, health, and psychological benefits are indicated in the accompanying *Daylighting Basics – Daylighting and Energy Savings* fact sheet.

Tubular Daylighting Devices (TDDs):

AAMA recommends that a separate product category be created for TDDs as opposed to including them with skylights. TDDs have their own unique characteristics that differentiate them from skylights, thus justifying a separate category. Most notably is that the NFRC program rates these products through physical testing methodologies that differ significantly from traditional skylight products. Also, new annual performance metrics are being developed by NFRC that will further set TDDs apart in their performance standards.

Thank you for your time and consideration. AAMA looks forward to continued collaboration with EPA in the development of V7.0 criteria.

Regards,



Richard G. Walker
AAMA President & CEO