



October 12, 2012

Ann Bailey, Director  
ENERGY STAR Product Labeling  
U.S. Environmental Protection Agency

RE: ENERGY STAR Most Efficient Program

Ms. Bailey,

Thank you for the opportunity to provide feedback concerning the EPA's ENERGY STAR Most Efficient program. ProVia applauds the EPA for developing the Most Efficient program to recognize the best of the best energy efficient products.

ProVia's greatest concern is the additional visible transmittance (VT) criteria for windows. ProVia supports a VT requirement and understands the reason behind it. However, the criteria must be achievable. ENERGY STAR must lower the minimum VT requirement or increase the maximum SHGC requirement in order for windows to meet the criteria. As the specification is written today it is nearly impossible to get a window to meet the Most Efficient criteria, even with the best glass in the market. ProVia recommends setting the minimum VT to  $\geq 0.35$ .

Again, thank you for the opportunity to provide feedback to ENERGY STAR. ProVia greatly appreciates their partnership with ENERGY STAR and looks forward to working with you in the future.

Best Regards,

Chris Nolt  
ProVia Products