



August 19, 2005

Mr. Sam Rashkin and Mr. Jonathan Passe
U.S. Environmental Protection Agency
1310 L Street NW, 9th Floor
Washington, D. C. 2005-4113

Re: Response to Proposed Changes to the ENERGY STAR Program

Dear Sam and Jonathan:

The Nelrod Company appreciates the opportunity to provide feedback on the proposed changes to the ENERGY STAR Program. We want to begin by thanking you for all your hard work and willingness to work with the ratings industry and our builder and utility partners. In an effort to avoid being redundant, The Nelrod company would like to inform you of our support of both the Texas HERO and RESNET positions that were recently drafted and sent to you. We were active participants in the drafting of these documents and believe that it accurately identifies our concerns and position as an ENERGY STAR Partner.

However, we did want to clarify one point that is contrary to what was submitted by Texas HERO relating to the Thermal Bypass Checklist. The Nelrod Company DOES support the requirement for items 2 and 3 on the Thermal Bypass checklist related to sheathing attic knee walls and cold floors and proper insulation installation. Under the performance path a rater does have the option to penalize the house by devaluing the insulation in those areas. However, under the prescriptive path it would not allow a builder who does implement the "best practice" to gain credit for it, creating an unfair comparison among builders using this compliance path. Therefore, we believe that both the prescriptive and performance paths should be required to meet this standard.

We thank you again for the opportunity to provide our opinion on the new proposed changes and look forward to working with you again on another successful year for ENERGY STAR in 2006.

Sincerely,

A handwritten signature in black ink that reads "Maci M. McDaniel". The signature is written in a cursive, flowing style.

Maci M. McDaniel
Development Director
The Nelrod Company