

Comments Via E-mail From Vikki Daniel, Perry Homes

I respectfully submit the following comments in regards to EPA's proposed 2006 guidelines.

Effective Date - Making the guidelines effective with homes *certified* on or after July 1, 2006 creates a problem for the builder community. Builders live off start dates and are able to implement changes more efficiently based off of *starts*. A home certified on or after July 1, 2006 does not allow the builders a specific date to make the proposed changes as build times vary from builder to builder and throughout product lines. By changing the effective date to homes started on or after July 1, 2006, it gives the builder a tangible date for material changes and cost increases.

Windows - Clarification is needed for the window requirements for the Performance Path. On the draft dated 7/25/05, #8 on page 2 states, "Energy Star qualified windows are recommended." Will windows be required to have the Energy Star label or will they only have to meet the U-Factor and SHGC?

Heating and Cooling Equipment - Clarification is needed for the heating and cooling equipment for the Performance Path. There are 13 SEER systems available that are Energy Star labeled. Would this be an acceptable product?

Analysis Software - We are being told that the analysis software for the 2006 guidelines will not be available to the raters until the 4th quarter of 2005. Without the appropriate software, the raters have no way to instruct the builders on how to properly analyze plans to the 2006 standard. This will put both builders and raters under an extreme time constraint with the start date of July 1, 2006 certifications. This will not allow builders enough time to make decisions that will impact construction practices, materials and products used in the homes, and profits due to increased costs.