

November 1, 2012

Doug Anderson
Project Manager
Energy Star Home Improvement Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC, 20460
Via email: Anderson.doug@epa.gov
Via email: windows@energystar.com

Re: AGC Glass Company North America Comments to Draft 2 Most Efficient Program

Dear Doug,

On behalf of AGC Glass Company North America (“AGC”), I express our appreciation for this opportunity to provide comments in response to Draft 2 of EPA’s Proposed Eligibility for Recognition of Residential Windows in the Energy Star “Most Efficient” Program (“Most Efficient Program” or “Program”).

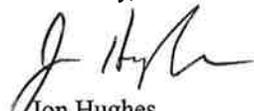
As indicated previously, AGC is in agreement with the U-value specified by EPA in the Most Efficient Program criteria.

We applaud EPA’s decisions to delete VT and add a minimum SHGC to the Most Efficient Program criteria.

Our only remaining concern is that, while a minimum 0.20 SHGC will eliminate some dark and tinted glass from the Program, the choice of such glass has, historically, been left to the homeowner as largely a matter of aesthetics, not energy conservation. To have an impact on energy conservation, which is the primary objective of the Program, a minimum SHGC of 0.30 or 0.35 should be considered as the Northern Zone criteria.

AGC sincerely hopes that the inclusion of 0.20 minimum SHGC in the Most Efficient Program is not intended to satisfy or be in lieu of the demonstrated need for a minimum 0.35 SHGC, or a more robust system of trade-offs, in the Northern Zone of the underlying ENERGY STAR Windows Program. Having said that, AGC stands ready to assist EPA in the development and implementation of credible Energy Star Programs .

Sincerely,



Jon Hughes

Director Marketing & Programs

cc: Christopher F. Correnti
Vice President, General Counsel and Secretary