

Hello Doug,

Keystone submits these comments a day late of the October 29 deadline as a result of Hurricane Sandy, we hope you weathered the storm without too much difficulty.

My comments focus on Proposed Eligibility for Recognition of Residential Windows, Draft 2, Recognition Criteria, item #2: *“Products must be certified to meet the North American Fenestration Standard/Specification (NAFS) with a Performance Grade \geq 15. An EPA-recognized certification body is not required for NAFS certification.”*

We believe the certification requirement should be clarified to prevent the self-certification issues encountered in the past. The requirement can be based on the existing accreditation criteria established in other ENERGY STAR documents, such as:

“Products must be independently certified to meet the North American Fenestration Standard/Specification (NAFS) with a Performance Grade \geq 15. ~~An EPA-recognized certification body is not required for NAFS certification.~~ Acceptable independent certification agencies shall be accredited to operate in accordance with ISO/IEC Guide 65, General requirements for bodies operating product certification systems by an accrediting body that is a signatory to the International Accreditation Forum (IAF) Multilateral Recognition Agreement (MRA) that operates in accordance with ISO/IEC 17011.”

Feel free to contact me with any questions or comments,

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