



October 26, 2012

Mr. Doug Anderson
Project Manager
Energy Star Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Emily Zachery
D& R International
1300 Silver Spring, MD 20901

Dear Doug and Emily,

Mathews Brothers Company, a long time Energy Star Partner, appreciates the opportunity to provide the following comments regarding Draft 2 of the "Most Efficient Windows Program" criteria.

Mathews Brothers fully supports EPA's efforts to promote highly performing window products by adding them to Energy Star's Most Efficient Products Program. We agree with the intent of the EPA's "Most Efficient" designation of being "the best of the best" of qualified products. By definition and design, it should be somewhat difficult to reach; otherwise a large number of products would qualify.

We would like to make the following comments in regard to the Draft 2 revised performance benchmarks that windows must meet to earn the "Most Efficient" designation.

1. U Factor at 0.20.
Mathews Brothers agrees that the U factor of 0.20 is a great benchmark for highly performing products. This value represents an increase in performance over DOE's R5 Highly Performing Products program which designated a U factor of 0.22, (which never was a true R5 product in the first place). We are glad to see that the revised proposal leaves the U Factor at 0.20.
2. Solar Heat Gain criteria for the Northern Zone
Mathews Brothers feels that there should be a minimum solar heat gain value for the northern climate zone. As backup to this comment we would reference the recent presentation by LBNL to EPA, regarding the Version Six Energy Star criteria, where they stated that there is a definite benefit of higher solar heat gain products in the Northern Zone.

3. Elimination of a Minimum Visible Transmittance Value.

Mathews Brothers feels that the minimum Visible Transmittance Value should not be removed from the program. We feel this because in order to attain the U factor requirement of 0.20, it will necessitate most windows to be made with a tri-pane glass sandwich with 2 layers of low-e glass. In many cases two layers of low-e glass reduce the visible transmittance and darken the glass sandwich considerably. We therefore feel that there should be a minimum Visible Transmittance Value so that consumers don't wind up getting dark windows which limit light into their homes.

Mathews Brothers Company is a small regional window manufacturer who has been dedicated to producing energy efficient products since 1854. Even though we are small, we have invested in the technology and we already produce competitively priced, energy efficient products that meet the original "Most Efficient Windows" Criteria. Because we know these products can be built cost effectively today, we would hate to see the original criteria watered down.

As we stated in our first comments, we strongly believe that a "Most Efficient Windows" program should truly represent the highest performing products and that EPA/Energy Star should stand firm with the guidelines and implementation dates as proposed.

Mathews Brothers appreciates this opportunity to submit our comments and opinions regarding the implementation of the Most Efficient Windows program.

Respectfully

Steven E Hart
Sr. Vice President, Research and Development
Mathews Brothers Company