



October 10, 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 the proposed "Most Efficient Windows Program".

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 proposed 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 would also offer the following comment on a higher (0.22) U value. Studies have demonstrated that glazing configurations that use surface four low-e in order to achieve a lower U Value are prone to increased interior surface condensation, which can have a significantly detrimental effect on overall window thermal performance, thereby defeating the intent of the program.

History has shown that no matter what performance goals are proposed for Energy Star standards there are companies who lobby against those proposed goals and the proposed timelines for implementation, primarily due to their inability to meet the increased performance goals. Mathews Brothers strongly feels that if EPA/Energy Star intends for the "Most Efficient" Program to truly represent the highest performing window products available, EPA/Energy Star should stand firm in their Benchmark of 0.20 for U factor.

2. Solar Heat Gain at Current Energy Star Criteria.

Mathews Brothers agrees that setting the Solar Heat Gain criteria at existing climate zone values is a good way to coordinate existing Energy Star criteria with the Most Efficient Windows Program.

3. Visible Transmittance at 0.40

Mathews Brothers agrees that there should be a minimum visible transmittance value because the thermal goals of the EPA "Most Efficient" should not include products that, due to reduced visible light, would not be acceptable to consumers. Most of the glazing combinations needed to hit the 0.20 U factor will require a triple glazed glass sandwich with two layers of low-E glass. Because many low-E coatings reduce visible transmittance, having two layers of them can cause the glass sandwich to appear very dark and significantly reduce the amount of visible light that passes through. Setting the whole unit VT value at 0.40 or greater will eliminate the dark glass effect.

4. Certification to NAFS Standard

Mathews Brothers agrees that window testing to the NAFS standard should be part of the "Most Efficient Windows" criteria. The NAFS standard includes testing and minimum standards for air infiltration, which does affect the overall energy performance of a window, as well as also testing for resistance to wind and water penetration.

5. Implementation Date of January 2013.

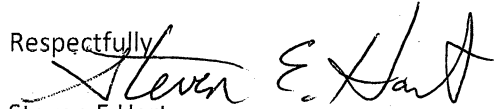
Mathews Brothers is excited that EPA/Energy Star has moved the implementation timeline up to January of 2013. Over the past few years we have invested significant time and dollars creating energy efficient products that met the standards of DOE's High Performing Volume Purchase program, and now, the Most Efficient Windows Program. Because we have products available today that meet the proposed criteria we are pleased that the Most Efficient Program will be implemented in January of 2013 instead of waiting until January of 2014 as was at one time a consideration.

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 to produce competitively priced, energy efficient products, and because of this investment we today manufacture several systems that meet the "Most Efficient Window" guidelines as proposed.

These window systems meet the proposed performance criteria without the need for expensive gas fills such as krypton, or exotic glass sandwiches. While it is likely that there will be comments from the large manufacturers, as always, stating that the proposed criteria is not cost effective or is too burdensome for them to meet by the proposed implementation date, we want to assure EPA/Energy Star that there are small companies like Mathews Brothers who have the ability to provide competitively priced products today that meet your proposed Most Efficient guidelines. 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,

A handwritten signature in black ink, reading "Steven E. Hart". The signature is written in a cursive style with a large, stylized "S" and "H".

Steven E Hart

Sr. Vice President, Research and Development
Mathews Brothers Company