

Note: U-factor, SHGC are also function of size, and environmental condition including temperature differential. In other words due to variations in National Fenestration Rating Council test sizes across operator types, whole-product U-factor and SHGC also does not provide a consistent basis of product comparison. EPA should also list which better approaches can be adopted to achieve EPA's goal, in order to provide comments.

Reasoning given for VT

- Removal of the Visible Transmittance (VT) minimum for all zones
 - Stakeholders noted that there were better approaches to achieving EPA's goals than setting a minimum VT criterion
 - Due to variations in National Fenestration Rating Council test sizes across operator types, whole-product VT does not provide a consistent basis of product comparison

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