



American
Architectural
Manufacturers
Association

April 30, 2010

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Dear Ms. Vokes / Ms. Kaplan,

Many representatives of the diverse membership of the American Architectural Manufacturers Association have participated in and studied the EPA general approach for enhanced testing and verification outlined in the presentation delivered on March 26, 2010. The concept of product performance testing and verification is nothing new to AAMA, as the organization launched the first window certification program nearly 50 years ago, in 1962. Today, the AAMA window and door performance certification program is the dominant program in the U.S. with a market share exceeding 65%, accreditation by ANSI and recognition by the national code organizations.

Conceptually, AAMA agrees wholeheartedly with the testing and verification tenets proposed by the EPA. NFRC administers a window and door thermal testing and verification program that currently enjoys widespread acceptance. Many AAMA residential window manufacturers participate in the NFRC certification and rating program and see no need for the EPA to create a redundant or parallel program. The NFRC program has served and protected U.S. consumers and homeowners for many years.

AAMA is also the largest NFRC Inspection Agency, by far. As a NFRC certification and inspection agency, AAMA reviews thermal performance simulation and test reports to ensure proper compliance and authorizes the printing of energy performance labels. NFRC Inspection Agencies also conduct an initial inspection of manufacturing facilities and annual inspections thereafter.

The EPA proposal of physical validation of performance has prompted the following concerns

- Out of synch with the current, widely accepted and recognized NFRC Program. NFRC uses computer-based simulations on standard sizes to derive thermal properties for labeling. Reconciling laboratory results from physical tests with computer simulated values would be an unnecessary and complicated burden.

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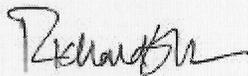
- Some window and door manufacturers promote custom window product delivery in 5-7 business days. The removal of audited or challenged windows directly from the production line would disrupt production, placing the manufacturer at a disadvantage in the marketplace.

Up to this point, this letter has focused on residential window and door products. The AAMA membership represents approximately 85% of the commercial window and door manufacturers in the U.S. The rating and certification of the thermal performance of commercial windows and doors is markedly different from their residential counterparts. Commercial fenestration is typically designed and built on a project basis and the curtain walls and sloped glazing, are large, complex systems, rather than individual units, filling single openings.

There is no established equivalent to NFRC for commercial windows, curtain wall, and sloped glazing. The nascent Component Modeling Approach recently launched by NFRC has very few participants and a number of glitches that must be corrected. AAMA commercial product manufacturers offer a wealth of expertise to assist the EPA in developing a workable ENERGY STAR rating and certification program for the commercial and architectural window and door products.

Representing 250 manufacturers and suppliers of residential and commercial windows, doors, and skylights, AAMA members and staff have worked extensively with the Department of Energy and the National Fenestration Rating Council in developing progressive ENERGY STAR, thermal performance values for the past 10 years. As with the AAMA air, water and structural certification program, NFRC members have devoted many hours to establish, and then improve, the integrity of their window and door thermal rating and certification program. Please consider the use of the established and successful NFRC program to address the EPA's ongoing product performance concerns.

Respectfully yours,



Richard G. Walker
President and CEO

cc: Rod Hershberger
Steve Fronek
Ray Garries
Cristen Baca
Ken Brenden