



Asphalt Roofing Manufacturers Association

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4/30/2010

EPA Energy Star
Roofing Program
Washington, DC

Dear Sir or Madame;

The Asphalt Roofing Manufacturers Association (ARMA) is the North American trade association representing the manufacturers and suppliers of bituminous-based residential and commercial fiberglass and organic asphalt shingle roofing products, roll roofing, built-up (BUR) roofing systems, and modified bitumen roofing systems.

ARMA's membership is concerned with the rapid and massive overhaul of the EPA Energy Star Roofing Program. ARMA's concerns fall into three categories: General Comments; Qualification and Verification Testing Comments; and Comments regarding the use of a Third Party Administrator.

General Comments:

- ARMA believes it is imperative to have multiple options for compliance. Multiple compliance options are an important and desirable goal, verses creating a monopoly by utilizing a single agency (e.g. CRRC). Single source monopolies do not foster a competitive and entrepreneurial spirit, but instead lead to higher cost for consumers and manufacturers alike.
- ARMA believes that the submission distribution channels and vendors are considered "Confidential Business Information" and potentially interferes with the capitalistic ideas of free trade and contracting practices. This proposed change will require a robust system for protecting confidentiality of proprietary information and will be crucial to instilling confidence within the manufacturing community.
- ARMA believes that the third party administrator approach adds unnecessary costs and burden to the consumer and manufacturer by adding another layer of bureaucracy by hiring an additional organization to perform the work which should be managed and the responsibility of the current EPA Energy Star Program Team.
- ARMA supports an approach of having MORE THAN ONE "non" membership reporting agency verses a single organization approach as found in California with the CRRC. Other organizations in the marketplace currently exist that do testing and certification on roofing products such as Underwriter's Laboratories (UL) and Factory Mutual (FM) and these agencies do not require membership to be a UL or FM Licensee.

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Qualification and Verification Testing Comments:

- ARMA believes that EPA Energy Star's requirement for three year aged data before having a product listed must be addressed immediately within the current set of revisions. Currently, Oak Ridge National Labs and Lawrence Berkeley National Labs and the Department of Energy are in the process of developing an accelerated aging protocol; however, this protocol will not be available for at least three years which again stifles product innovation, time to market and increased energy saving and efficiency through the Energy Star Program.
- ARMA questions the need for a third party administrator to administer verification testing as it is another level of bureaucracy and added cost to the manufacturer and consumers. ARMA might suggest a process where an independent lab could obtain samples at EPA's direction to test and submit results as they do in the qualification testing?
- ARMA believes that the verification path (checking for adherence of listed products to the requirements) for roofing is likewise too much and unduly burdensome for a material class that is NOT reporting actual values but meeting a minimum requirement.
- ARMA believes that the continuous retesting of all certified products at least every three years is unreasonable for roofing products, since the initial qualification process takes more than three years. Additionally, the life expectancy of any roofing product is most likely longer than that of any home appliance which may be replaced more frequently than a roofing system.
- Some ARMA members believe that verification through an arrangement that monitors changes in products after initial qualification (e.g. via third-party inspections) is a model worthy of consideration. The roofing industry presently uses this process to address issues of much greater concern (e.g public safety) than reflectivity.
- ARMA is concerned about that statement that is made in the presentation that, "If models deemed failure based on testing, EPA delists product." ARMA is unsure if this is an automatic delisting of the product or if there a remedy process that is being considered where the manufacturer is contacted, both the EPA Energy Star Team and the manufacturer review the test to determine if any issues and then the product is re-tested.

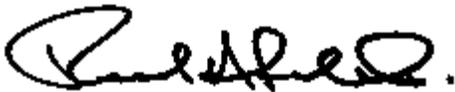
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3rd Party Administration:

- ARMA believes that the Third Party Testing and Program Administration on page 6 is an abdication of the Energy Star Program and staff responsibilities. EPA Energy Star should consider alternative compliance paths that DO NOT incur the high cost of contracting, staffing and benefits. ARMA would again point to other testing agencies such as UL or FM who could add these tests to the standard list of tests they are currently doing to meet other safety requirements.

ARMA and its membership believe the EPA Energy Star Program, has faced extreme criticism from consumers, the news media and other government agencies like GAO and is reacting too quickly and carelessly to correct the problem without considering the ramifications of rapid changes to the program. These impacts and ramifications include but are not limited to restriction of product markets, stifling innovation, increased consumer and manufacturer costs.

Thank You,

A handwritten signature in black ink, appearing to read "Reed Hitchcock". The signature is stylized and cursive.

Reed Hitchcock
Executive Vice-President