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**From:** Angelo Marasco [angelo.marasco@odl.com]  
**Sent:** Friday, April 30, 2010 12:31 PM  
**To:** EPA ENERGY STAR  
**Subject:** Public Comment on Proposal

Greetings.

ODL appreciates the opportunity to provide feedback on the enhanced verification and testing proposal for the ENERGY STAR program. As a manufacturer of fenestration products that are assembled in doors, we support the current NFRC third party qualification procedures already in place for windows, doors, and skylights through the NFRC. These procedures account for the fact that many doors are assembled by local pre-hangers, who in effect are the manufacturer for certification purposes. The NFRC procedure requires each certified pre-hanger/manufacturer to be audited annually by a NFRC licensed independent inspection agency to ensure that products continue to meet the certification requirements.

The proposed testing program to audit compliance creates another verification step on top of the current NFRC requirements. ODL's concern is the extent to which these additional costs are redundant and burdensome to the local pre-hanger. The NFRC certification process, as evidenced by the Certified Product Directory accessible to the entire public, currently achieves the intended goal of the proposed enhancements.

Regards.

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