



Dear Mr. Anderson,

Thank you for providing us an open forum for the ENERGY STAR verification plan going forward.

It was our overall impression that the NFRC program was a model program for ENERGY STAR verification and could be applied to other product types. Some of the comments we heard from EPA in the webinar (March 31th) was the Government's Accountability Office (GAO) study had no problems with windows and doors.

A brief review of the GAO "Report on ENERGY STAR March 2010" left us with comfort that the system developed w/ NFRC these past 20 years is very much in line with the GAO's recommendations. This would make sense since it was government funding that initiated the NFRC.

Now we find ourselves forced to ask the question, if there was nothing that would indicate a need for additional verification of windows and doors, why is it necessary to implement a costly add-on program? This effort is in a time-frame that may put us at risk of introducing flaws into what is already considered a successful program. The current program took 20 years to perfect and is costly to the hundreds of manufacturers that use it. A significant amount of industry resources are spent generating the hundreds of thousands of simulated/validated product line items that make up this voluntary NFRC database. We are just starting to see the benefits of the NFRC program as verification to ENERGY STAR, but now we are being told there will be additional costs.

A more realistic goal might be to verify that manufacturers are providing legitimate values from a valid third party verification program i.e. NFRC. As the program costs increase while marketable value is on the decline, manufacturers may choose to abandon the program. Often times these manufacturers then choose to "self certify" and place look-alike ES labels on their products jeopardizing the validity of the Energy Star program for all manufacturers.

We don't claim to have the perfect program and embrace opportunities to improve. However, we have already signed the 2010 partnership agreement with ENERGY STAR and are well under way at providing products that are labeled and meet the new 2010 ENERGY STAR values. The EPA just recently took on the task of administering ENERGY STAR, we urge you to allow this first phase of ENERGY STAR to run as is and continue to gather data and research to make improvements you may find necessary for the next phase II.

Based on earlier comments; for the past 20 years, industry along with NFRC has worked diligently to produce a credible rating system. These efforts cost industry several million dollars

annually. The current program to label Energy Star windows and doors works well with NFRC Certification; it is fully transparent and verifiable.

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