



Dear Mr. Berringer,

Thank you again for giving us an opportunity to make comment to the ENERGY STAR Plan going forward.

It is our position that the system developed by the NFRC for establishing verification of certification for windows and doors is working. All products are simulated and then a base model is tested to verify the simulations are being performed within some degree of accuracy. NFRC maintains a database of several million/billion lines of all certified products. Searches can be made in the NFRC Database for any level of performance from any manufacturer. We along with others use this same upload after testing to produce an upload for our systems to produce proper NFRC labels and if the product meets criteria an Energy Star label is printed as well.

Over the past 20 years industry along with NFRC has worked diligently to produce a credible rating system. The effort to certify these products costs 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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