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Sent: Thursday, April 22, 2010 3:49 PM
To: ENERGYSTARVerificationProgram@energystar.gov
Subject: Roof Comments

My comment are focused on the cool roof program in particular.

I believe the implementation of certification and auditing is a good thing, so I agree whole heartedly with the direction Energy Star is taking.

- Using certified independent test labs to me is a requirement, as certifying manufacturers still leaves the program prone to gaming.
- For Energy Star's Window, door and skylight program, a product must have been rated with the National Fenestration Rating Council, and meet Energy Star's criteria, to be listed or certified with ES's program. As a parallel to this, the Cool Roof Rating Council (CRRC) has a full rating program for cool roofs which includes all key criteria requirements called for in the proposed changes to the roofing program
- I believe the aggressive time line as proposed (implementation for new products by the end of the year) will be extremely difficult to meet if a new program is hatched.
- ES needs to quickly identify what will happen to existing products which are rated. Will they need to be re-rated? By the same procedure as new products? What about 3 year aging, especially if manufacturers can no longer supply material of that age? This will be a more pressing issue than registering new products with the new program.