



4/30/2010

EPA Energy Star
Roofing Program
Washington, DC

Dear Sir or Madame;

The Roof Coatings Manufacturers Association (RCMA) is the North American trade association representing the producers of bituminous and non-bituminous (acrylic and elastomeric) roof coatings and cements, which are applied in new and resurfacing roofing systems and are also used as repair and maintenance products.

RCMA's membership is concerned about the rapid and massive overhaul of the EPA Energy Star Roofing Program. RCMA's members concerns are as follows:

- RCMA believes that EPA Energy Star Program Team should coordinate with the stakeholders who hold ratings through the program and through radative rating organizations (e.g. Cool Roof Rating Council—CRRC) and other testing and certification agencies like Underwriters Lab (UL) and Factory Mutual (FM) in order improve the process and the program such that consumer and manufacturer confidence in the program is restored.
- RCMA believes that the manufacturer challenge provision has the potential to cause wide spread problems between industry segments who are looking to hold up product innovation and protect market share if not administered properly. Additionally, RCMA will be interested to see and comment on the process should it be adopted.
- RCMA believes there are a number of ways to achieve verification compliance, for example some RCMA members due to the nature of their business do not sell through normal distribution channels and instead sell direct to owners and contractors. These companies' products are sold on a per job basis, so contractors will not be carrying inventory of any particular product. It would appear that EPA Energy Star prefers to obtain products from the marketplace; however, the CRRC had the same issue when in trying to conduct their verification testing. The verification was resolved by working with UL to collect a certified unit from a companies' inventory. These roofing products are manufactured under the UL Follow Up Service, which verifies that products are being made the same way, all the time. EPA Energy Star will need to consider similar issues and should recognize alternative verification and sample collection methods from the start and avoid future problems.
- RCMA 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.
- RCMA 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.

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- RCMA believes that there are other options available to the testing of all products every 3 years. For example, some RCMA member companies are under inspection by an independent agency like UL to verify that a company's products and formulas continue to meet certain standards and specifications. RCMA members believe that continuously testing every three years of a product comes at a high cost to the manufacturer and to the consumer to meet the verification requirement.
- RCMA is concerned about that statement that is made in the presentation that, "If models deemed failure based on testing, EPA delists product." RCMA 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.
- RCMA believes this proposal adds an additional layer of complexity and expense to the manufacturers. The market can and will determine who has the better product. By making this process more complicated AND expensive to the manufacturer does not necessarily lead to better products being developed for the consumer. The added complication and expense could lead to less innovation from manufacturers who now have to devote addition resources and time to this instead of research and better product development.

Overall, EPA Energy Star is rushing the revisions to the program too fast and has not allowed for adequate time for stakeholder to review and understand the process and/or make comments. There was nearly a six calendar day disconnect between the April 6, 2010 webinar and the posting of the actual posting of the PowerPoint on the EPA website which effectively reduced the comment period from 24 calendar days to 18 calendar days.

In closing, the EPA Energy Star Program is facing a crisis much like the crisis that Toyota faced this year; however, the difference is that Toyota has committed to a balanced approach. Toyota has admitted that there are problems; Toyota is working to correct the problems; and Toyota has brought to bear all the necessary resources to continuously improve the product and the process to instill consumer confidence in the brand while continuously communicating the successes at each step of the way. EPA would benefit by modeling its improvement process after Toyota.

Thank you,



James Baker
Director of Industry Affairs
Roof Coating Manufacturers Association