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**From:** Zachary McCartney [zmccartney@seawaymfg.com]  
**Sent:** Friday, April 30, 2010 5:33 PM  
**To:** ENERGYSTARVerificationProgram@energystar.gov  
**Subject:** Comments concerning Enhanced Testing and Verification

Dear Energy Star,

Seaway Mfg. Corp. would like to take this opportunity to make the following comments regarding the proposed procedures for qualification and verification of Energy Star qualified products. First of all, thank you for the public webinars that you have hosted over the past month on this subject; we have found them very informative. Our company is a small to medium sized manufacturer of custom replacement vinyl windows, patio doors, & steel entry doors. We are proud to say that we are an Energy Star partner and are able to offer consumers energy efficient home improvement products. We believe increased energy efficiency is a worthy pursuit and an issue relevant to our current manufacturing landscape. Over recent years, the Energy Star branding has become more prevalent, with educated consumers inquiring more about product qualification. For some consumers, this branding is the lynchpin of their purchasing decisions. With that said, we as a manufacturer are very concerned with the logistics of the enhanced verification program that Energy Star is proposing across the board for all product qualifications; especially for fenestration products. Similar concerns have already been noted during the online Q&A at the end of the webinar. Our concerns are as follows:

1. Our primary concern is with the economics behind this proposal. First it was unclear who would carry the burden of these costs; but our guess is the individual manufacturers. Secondly, it was unclear from the webinar if this verification process was proposed for all product lines from a manufacturer or not. Based on NFRC's definition of product lines, we have 12 different fenestration product lines listed in the NFRC Certified Products Directory (CPD), which is probably typical for most manufacturers our size. The going rate for any NFRC 102 validation test ranges from about \$1000 to \$1500 per test per product line. If the individual manufacturer were responsible for covering these costs, this would be a huge and detrimental financial burden on these manufacturers. As a result there are likely to be many smaller to midsize manufacturers that have good, energy efficient products that meet all the Energy Star requirements, but who are unable to afford all the annual testing & certification fees required to be an Energy Star partner. This could, unfortunately, force these manufacturers to either close up shop, or generate a marketing strategy to sell against Energy Star since they can no longer afford to be called an Energy Star partner, even though they meet all the Energy Star performance requirements. Essentially we are concerned that the associated fees, not the product performance requirements of the Energy Star program, will force out long-standing, current partners, or keep new manufacturers from participating. Neither of these facilitates an atmosphere for promoting good stewardship for the energy resources we are trying so hard to conserve, as well as trying to stimulate our struggling economy. Our request is that in this pursuit, Energy Star not hastily assume that all manufacturers are capable of shouldering this additional financial burden from verification testing, and to look at using the verification processes that NFRC already has established without adding more to the requirements.
2. We fully understand the desire to ensure consumers have a product that will perform as labeled; however, the performance of fenestration products is dependent on ambient weather conditions (such as air temperature & wind speed). Since weather conditions are always in a state of flux, it is impossible to expect fenestration products to perform the same in all weather conditions. At some point assumptions must be made so that relative comparisons can be made between differing products. This has always been the logic behind the NFRC testing and certification program. We don't believe it is necessary to deviate from what is already established.

3. With the proposal of having to verify products on an ongoing annual basis, another concern is with the capacity of the testing labs. As seen when the ARRTA tax credit requirements were changed last minute prior to going into effect in mid February 2009, the simulation and testing labs were unable to sustain the immediate need from the industry. Labs were backed up for months as they tried processing all the requests for testing & simulations. This was a significant negative impact to a large portion of the industry. Unless you were already in the queue with a testing lab, you were left stranded until the system could catch up with the demand.
4. One of the questions tabled for industry comment by one of the Energy Star webinar hosts was how to verify the energy efficiency of window sizes different from the standard NFRC test size. First of all, NFRC was established to give consumers quantitative and impartial comparison between fenestration products based on a fixed set of assumptions, including test window size. However, though the simulation software used to determine thermal performance is capable of such calculation based on frame size, the NFRC program was not setup specifically to report thermal performance at multiple varying sizes. To add this requirement would bog the simulation labs and independent auditors (IA) further, which we believe would be counter productive. We would first suggest getting expert feedback from NFRC to determine how significant of a change in thermal performance there is in a window as its frame size varies, and whether or not this change still falls within the acceptable tolerances for the testing program already established by NFRC.
5. One of the questions posed by a participant of the fenestration webinar was to combine structural (air/water/structural) verification with thermal verification so that it was a unified validation requirement. Though this was only a question and not part of the Energy Star proposal, we would still like to comment on it. Though we fundamentally agree with trying to unify verification & validation standards to reduce costs and overlapped testing criteria, we do not believe that structural & thermal verification should be combined, nor be a requirement for Energy Star partnership. With respect, we feel that this is outside the scope of Energy Star. Since different structural configurations such as different glazing or reinforcement packages cannot be easily simulated like with thermal performance, the only way to verify a window configuration structurally is with physical testing. With standard testing costs for an AAMA/WDMA/CSA/IS2/A440 test ranging from approximately \$1500 to \$2000 per window configuration, the financial burden increases exponentially when you start considering all the possible thermal and structural permutations you can have just for a single product line, assuming that all structural configurations must be tested and verified.

Seaway Mfg. Corp. thanks you for this opportunity to comment on this Energy Star proposal. Please feel free to contact us if you wish to discuss any of our comments in further detail.

Best regards,

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