



Simonton Windows  
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US Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

Ms. Kathleen Vokes:

Below are comments from Simonton Windows, Inc., regarding the proposed Enhancement Testing and Verification outlined in the Energy Star webinar on March 31, 2010.

- As stated in the conference call, the window and door rating system established by the NFRC for Energy Star product certification is a trusted industry standard that has served and protected consumers well for many years.
- The EPA proposed audit and challenge processes would utilize physical validation testing of custom-built production windows. This is out of alignment with the NFRC process which utilizes computer-based thermal simulations on standard sizes to derive thermal properties for labeling and is validated with a physical unit to a gateway size. Reconciling lab results from physical tests with the thermally-simulated values would represent a challenge.
- If physical audits do become a requirement for the Energy Star program, they should strictly be utilized to evaluate zone compliance.
- Simonton provides a custom-made window to customers in 5-7 business days. Removal of audit or challenge windows from the production floor could disrupt production and potentially put deliveries to customers at risk.
- We are concerned that there are a limited number of certified testing facilities available to conduct the work.
- Manufacturers will need to have an established process with guidelines to be put in place to address instances where manufacturers would have a valid basis to dispute audit and/or challenge results.

Thank you for the opportunity to respond to the recent webinar. We sincerely appreciate your consideration on these matters.

Respectfully,

Tina Jenkins  
Thermal Code Specialist  
Simonton Windows