



April 30, 2010

Via Electronic Submission

Kathleen Vokes
ENERGY STAR Products Program
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Third Party Certification and Verification of ENERGY STAR Products – Windows, Doors, and Skylights

Dear Ms. Vokes:

On behalf of the Window and Door Manufacturers Association (WDMA) I am pleased to respond to EPA's request for additional comments on EPA's proposed enhancements to third party certification and verification requirements for ENERGY STAR products.

As we have previously commented to EPA, WDMA members are proud of the contributions they have made to the evolution and success of the ENERGY STAR Program, helping to make it a household name and trusted brand nationwide. WDMA therefore supports efforts to enhance the existing ENERGY STAR Program by establishing improved verification processes for product areas where such processes are lacking. We agree that is essential to the integrity of the ENERGY STAR program as a whole.

To that end, we believe it is imperative that such efforts fully recognize existing product programs that work, and work extremely well, without the need for significant changes because they already employ the quality assurance measures described in the Enhanced Program Plan. We therefore greatly appreciate EPA's recognition of the ENERGY STAR Residential Window, Door and Skylight Program as one such example where significant changes to the measures currently employed are not needed because of the sound third party testing and verification that is already required through the National Fenestration Rating Council (NFRC) certification process before fenestration products can be ENERGY STAR qualified. We strongly support that recognition and believe that the current ENERGY STAR Residential Window, Door and Skylight Program provides EPA with an excellent guide for enhancing other product programs that may be lacking portions or all of those quality assurance attributes.

That said, we do understand EPA's consideration of what, if any, improvements may be practical or deemed important to the window, door, and skylight verification requirements and appreciate the outreach the Agency has made to its ENERGY STAR Partners and stakeholders in this regard. We especially appreciate EPA's intent to work cooperatively with the NFRC in response, to develop any new proposed verification requirements for ENERGY STAR windows, doors, and skylights based upon the direction the NFRC is already taking on the issue, as discussed during the March 31, 2010, conference call with window, door, and skylight partners and stakeholders. It is critically important that that cooperative effort and objective be maintained, and in addition, that WDMA and other stakeholders continue to be included in such efforts.

WDMA appreciates this opportunity to provide additional comments on EPA's efforts to enhance its ENERGY STAR products programs. We also look forward to continued cooperative efforts with the Agency to improve our nation's overall energy efficiency, reduce residential contributions to greenhouse gas emissions, and promote energy independence through ENERGY STAR initiatives and programs.

Please contact me if you have any questions or would like additional comment from WDMA at this time.

Sincerely,

Jeffrey T. Inks
Vice President – Codes & Regulatory Affairs
Window & Door Manufacturers Association