



June 25, 2010

Ms. Ann Bailey, Chief
ENERGY STAR Labeling Branch
US Environmental Protection Agency

Dear Ms. Bailey:

Pella Corporation appreciates the opportunity to review and comment on EPA's draft "Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program". We applaud EPA's goal of maintaining the ENERGY STAR Program as a useful and credible tool for consumers to use in making informed purchasing decisions, and we support meaningful enhancements to the program consistent with that goal.

Pella Corporation understands that EPA has every intention of continuing to rely on the NFRC Product Certification Program as the sole basis for determining compliance with ENERGY STAR Windows criteria. We very much support that position and encourage EPA to do so. The NFRC program is based on over 20 years of consensus development among a broad composition of stakeholders from industry, consumer interests, laboratories, government, regulatory, academia, and others. The result is a solid and robust program on which EPA can and should continue to rely.

We further understand that EPA desires to add a blind verification provision to the ENERGY STAR Program for all product categories, including fenestration. Pella Corporation appreciates that certain recent developments outside of the fenestration industry have prompted this desire. However we ask EPA to remain mindful that these developments occurred within product categories that are not governed by a rigorous third-party product certification and labeling program such as the NFRC Program. We therefore ask that EPA please proceed cautiously in this regard so as to ensure any new requirements provide true and genuine value for all program stakeholders. We encourage EPA to work with NFRC to build suitable blind verification provisions into the current NFRC Program. To reiterate, we believe it is in the best interest of all ENERGY STAR Windows stakeholders for EPA to continue to rely on NFRC's well established consensus approach for all ENERGY STAR Windows qualification needs, including the development of blind verification provisions.

Lastly, we encourage EPA to implement any blind verification provisions over a reasonable time-frame. While such provisions have the potential to add value for consumers, they also represent potential significant cost increases for NFRC Program participants. In order to lessen the impact of these increased costs, we recommend implementing the new provisions in March 2013, in association with the recently announced ENERGY STAR Windows criteria revision. There is a definite rationale in implementing both of these revisions at the same time, and doing so will allow adequate time for all affected interests to adjust accordingly in a fair and equitable manner.



Pella Corporation

Thank you for your time and attention. We look forward to working with EPA to achieve continued success of the ENERGY STAR Windows Program and would welcome the opportunity to discuss this with your staff in more detail at your convenience.

Sincerely,

Joseph Hayden
Senior Project Engineer, Certification

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