



June 23, 2010

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To: DOE/EPA Energy Star

The Reflective Roof Coatings Institute was established in 2005 as a non-profit corporation with an overall goal to advance the best interests of the reflective roof coatings industry. Our membership consists of manufacturers, raw material suppliers and associate members who have services within the reflective coatings industry.

The RRCI has concern that another layer of testing/protocols/costs will result from an implementation of "Enhanced Qualification Testing Requirements" for Energy Star qualification. The RRCI membership fully supports the Energy Star program. Likewise, our members support the Cool Roof Rating Council (CRRRC) where an intensive long term testing process is already in place to qualify for CRRRC product ratings in reflectivity and emissivity. Almost everyone producing reflective roof coatings also tests products with organizations such as Underwriter's Laboratories (UL), Factory Mutual (FM), and Dade County Florida; all this is time consuming and costly.

The RRCI membership would like to suggest to DOE/EPA Enhanced Testing Coordinators that the adoption of the CRRRC protocols be considered as compliance with Energy Star under enhanced requirements testing.

Further, producers of reflective roof coatings have hundreds of raw materials from which to choose based on economics/performance/availability/quality concerns. Changes in these raw materials do not significantly change reflectivity or emissivity properties. It is suggested in-house testing data showing compliance be made available upon request in the case of a raw material change which has no technical effect on the Energy Star or CRRRC properties.

We appreciate your time and openness to our insight on the issue.

Sincerely,

Penny Gift
President, 2010-12
Reflective Roof Coatings Institute