

Dear Maria

On behalf of Quanex Building Products we would like to offer our comments regarding the Top Tier program for Energy Star. First I would like to introduce you to Quanex Building products which is made up of four companies, Nichols, Homeshield, Mikron and Truseal Technologies. Homeshield, Mikron and Truseal Technologies make up the Engineered Products Group which is primarily focused on residential fenestration and door products. Many of our products are designed to conserve energy and enhance the thermal performance of windows and doors and as such we are actively supporting the industry and encouraging our customers to adopt energy saving technologies in their window and door products.

We would like to offer our full support of the Top Tier program concept and we see the need to add further differentiation to the Energy Star for windows program. The following would be our comments.

Currently 76% of all residential windows and 70% of all entry doors sold are Energy Star labeled (Ducker Research - ENERGY STAR Window & door Tracking Program August 2010).

In a presentation on March 16 2010 at Glass Expo Midwest 2010 Fenestration Day, Chicago, DOE's Marc Lafrance presented figures on energy consumption as follows; 57% of energy consumed by buildings was related to the building envelope vs 12% for appliances, 10% for water heating, 7% for electronics and 2% for computers

Clearly windows and doors are a key category within building envelopes that should be targeted for energy conservation and have the potential to save more energy than appliances or other energy star product categories. We at Quanex Building Products feel that windows and doors should be included in a Top Tier program should this level be developed.

Since the launch of the R5 Volume Window Purchase program approximately 60 window manufacturers have submitted window products that could qualify and 42 companies have qualified products certified in the program. R5 represents an approximate 40% improvement in u-value over current Energy Star northern zone window u-value requirements. This level of participation is approximately 10% of the window manufacturers currently participating in energy star.

Based on the manufacturer participation so far with the R5 Volume Window Purchase Program, it is clear that technology exists for significant improvements in window energy savings and should be affordable to consumers

We support establishing the top 5% level at the R5 level currently described by the Volume Purchase program. Given that the design to production, testing, certification and product launch for new windows and doors is relatively long, using a performance based criteria such as that suggested in "Alternative Approaches #2", we believe would be best for the industry. This approach also encourages a continuous effort to develop improved window and door energy performance technology.

Window and door designs have a much longer life cycle than most appliances and thus should also be given consideration for a longer approval cycle in the Top Tier category – we would suggest products be listed for 5 years once qualified. If this period ends up being much shorter, there may be a disincentive to spend the time and resources to develop new products in order to qualify for "maximum-efficient" status.

We hope our comments are helpful in your analysis.

We would also like to ask if the data collected in your consumer studies is available for review by the public as it would be very useful for our business.

Best regards

Eric Jackson

Director of Marketing and Business Development

Quanex Building Products - Engineered Products Group