

April 9, 2002

The Honorable David Garman
Assistant Secretary for Energy Efficiency
and Renewable Energy
1000 Independence Avenue, SW
Room 6C-016
Washington, DC 20585

Dear Assistant Secretary Garman:

I wish to thank you for the opportunity to participate in the Public Meeting of March 20 to discuss new criteria for the Energy Star Windows program at the Department of Energy.

AFG Industries, Inc. is a stakeholder and is the major manufacturer that uses both sputter coating and pyrolytic coating technologies.

In considering what the final proposed criteria will be, I cannot emphasize enough the need to maintain a competitive environment between the sputter and pyrolytic coating technologies. The electrical energy needed to produce sputtered low-e can be up to 9 times the electrical energy needed to produce pyrolytic low-e. This differential in electrical consumption necessitates the maintenance of a competitive environment in which no energy efficient technology is excluded from the Energy Star program. The pyrolytic process came about through a competitive environment and a competitive environment will continue to spur the development of new technologies capable of yielding even greater annual energy savings. Allowing one form of technology to monopolize the marketplace will ultimately doom progress toward a greater reliance on renewable energy sources -- which is, of course, the primary goal of the Energy Star program.

After reviewing the additional comments and suggestions recently posted to the Energy Star Windows website, it appears the submission from Simonton Windows would accomplish both of these goals -- preserving multiple technologies which are ever so important from a competitive business and programmatic perspective, and ensuring the direction of this worthwhile program is pursued appropriately with regard to further promoting renewable energy sources.

Thank you for your time and attention to these important issues. I remain,

Very truly yours,

Thomas J. Mewbourne
Director Customer Technical Service

cc: Richard Karney