

Dear Steve Ryan: cc Kathleen Hogan.

I am writing as one of the two members of the CEC's Energy Efficiency committee, which is responsible for our Title 24 new buildings standards, and where we rely on Energy Star to **beat** these standards, not to conflict with them.

Dr. Hashem Akbari has just send me his "disappointed" comments on your proposal to drop the Emittance floor for energy star metal roofs, when there should be a floor of roughly 0.75, as required by California Title 24 (2005). Dropping the floor is equivalent to giving an unacceptable blessing of a thermally poor roofing material, which the manufacturer can easily fix by coating it with a high-e coat, or painting it white.

Ever since Akbari and I started studying urban heat islands 20 or 30 years ago, we have pointed out that galvanized (low-e) metal roofs not only run very hot on a summer afternoon, but to add insult to injury, they cannot radiate to the night sky, so they stay hot all night, to the discomfort or expense of anybody living underneath them

Could you please give me a call and help me understand how this omission came about, and what has to be done to correct it?

Thanks,
Art Rosenfeld