



Roof Coatings Manufacturers Association

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March 23, 2007

Rebecca Duff

ICF International

9300 Lee Highway

Fairfax, VA 22301

Re: ENERGY STAR Version 2.0 Final Draft

Dear Ms. Duff:

The Roof Coatings Manufacturers Association (RCMA) is the North American trade association representing the producers of bituminous and non-bituminous (acrylic and elastomeric) roof coatings and cements which are applied in new and resurfacing roofing systems and are also used as repair and maintenance products.

To begin, RCMA would like to thank ENERGYSTAR for taking the time to meet with representatives from our industry last fall. We have carefully reviewed the revised Final Draft, and would like to commend ENERGYSTAR on the most recent draft.

RCMA supports the revised version of ENERGYSTAR 2.0, and more specifically the removal of the proposed national emissivity requirement. We agree that setting a national emissivity standard would diminish potential energy savings in certain parts of the country.

Additionally, as we have previously suggested, we strongly believe that ENERGYSTAR should recognize that climate conditions in different geographic areas necessitate the

establishment of different standards for roofing products. To that end, RCMA fully supports ENERGYSTAR's interest in pursuing a regional approach to roof coating qualifications, and would be more than willing to provide your office with any industry data that is needed to develop a regional approach.

Once again, we commend you again on your insightful and forward-thinking draft, and we appreciate your kind consideration of our position. Please do not hesitate to call me at 202-207-1114 or e-mail me at lharris@kellencorpany.com if you have any additional questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Laura M. Harris". The signature is written in dark ink and is positioned to the left of a vertical line.

Laura M. Harris
Regulatory Affairs Specialist

cc Steven Ryan, EPA
Brock Landry, RCMA General Counsel
RCMA Government Affairs Committee