

As I said in my previous comments, by setting your emissivity limits so high on roof coatings, you are effectively cutting 15-20% of the US roof coating production out of your program. Whether you find that eliminating that amount of possible support for your efforts is important is obviously your decision. Since I am unaware of any definitive testing on the effects of emissivity on roof surfaces in heating dominated climates (where they also have cooling issues in the summer), it might be to everyone's advantage for you to sponsor some testing that answers these questions. Since it appears that reflectivity is the dominant issue, most of the aluminized coatings seem to do very well in this category, and, again, would be eliminated from your program. I am also not convinced that it is necessary to be "in synch" with other roofing programs (i.e. Cool Roof Council), since your program appears to be the most dominant, and by introducing these high emissivity numbers, you will be introducing a new level of controversy ( and possible lack of support for your efforts) into the roofing community. I can assure you that roofers will not stop using aluminized roofing coatings since most of them are more long lived than white coatings, and very price competitive. Roofers do not change their habits under duress. I hope you will consider retracting your emissivity requirements since they add more controversy than consistency.

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