



Mr. Doug Anderson
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

February 8, 2013

Doug and Emily:

Thank you again for the opportunity to comment on the proposed revisions to the Energy Star® program for Windows, Doors, and Skylights. I will keep this very short, and not repeat all our previous comments. We support the added equivalent energy performance options for the north, as well as the improvements to the door criteria. However, we continue to urge EPA to include equivalent energy performance options for the south that provide the consumer more choice and equivalent or better performance (and *can* be consistent with the 2012 IECC in zone 1 and through section R102 and R405), and we also support a lower U-factor in the north.

As far as new items, we have one suggested wording correction to the draft specification document. EPA has affirmed that the program only applies to products in lowrise residential buildings, and does not apply to nonresidential nor highrise residential buildings, which are covered through other EPA Energy Star programs for buildings that stress whole building integrated design. However, this is somewhat buried in the current specification document; one has to read the definition of residential building (line 101-103) in conjunction with the use of the window (line 22-25) and the scope (lines 110-116) to determine that the program does not apply to windows in highrise residential four stories and up. To avoid confusion and make it clear, we suggest the following change under the list of excluded products (lines 114-116):

- B. Excluded Products: Products that are assembled onsite, including but not limited to sash packs or sash kits; windows, doors, or skylights that are intended for installation in [residential buildings four stories or more in height](#) or non-residential buildings; window, door, or skylight attachments that are not included in a product's NFRC-certified rating.

This is consistent with the current document, but makes it much more clear.

Thank you again, and please feel free to contact me at any time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas D. Culp'. The signature is fluid and cursive, with a long, sweeping tail on the final letter.

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