

November 18th, 2011



Subject : Comments on ENERGY STAR for Windows, Doors, and Skylights
Version 6.0 Product Specification Framework Document, October 2011

We would like to thank EPA for giving stakeholders the opportunity to comment on the proposed framework document for Windows, Doors, and Skylights. Our comments reflect the views of our technical committee which represent the Québec Window and Door Manufacturer's Association. Our association represents 165 window and door manufacturers and suppliers to the Industry across Quebec. Our individual members may provide independent and supplementary comments as they see fit.

ENERGY STAR programs in the US and in Canada have been hugely successful and have driven market transformation across the board in both countries. The Canadian and US economies are intertwined and there is a fair amount of trade of Fenestration Products across the Canadian / US border. While both countries have distinct agencies overlooking the ENERGY STAR programs, the general objectives remain the same. Recognition of American certification agencies such as NFRC in Canadian Codes and Standards as well as the harmonization of AAMA, WDMA and CSA standards into one North American Fenestration Standard speaks volumes to the interconnectivity of this industry in our 2 countries. For this reason, we feel it important to express our views on some of the proposals brought forth in your framework document.

We have 4 points which we would like to comment on :

1- Program Elements Considered for Adoption:

- a. **Structural Requirements** – We agree that while NAFS *certification* at this time would create backlogs at labs and association resources as well as create undue economic burden on our industry, we would encourage EPA to consider an approach similar to the Canadian ENERGY STAR program which requires manufacturers to show proof of testing to structural standards without requiring certification to the standard.

These criteria would bring added credibility to the ENERGY STAR program by ensuring ENERGY STAR qualified products have been tested and would put all manufacturers on a somewhat more even playing field.

2- Proposed Revisions to Product Criteria

a. **Windows** – We believe that the differential between the minimum range of the criteria proposed is too significant and would require major changes to current fenestration systems resulting in major investments for manufacturers who are already operating in a harsh economic climate. The Canadian ENERGY STAR proposal for phase 2 is currently under review. It proposes a 0.28 U-Factor for Vancouver, British Columbia. In comparison, EPA's proposal at the lower end of the spectrum would put Seattle, Washington at a significantly lower U-Factor than Vancouver, British Columbia. Commercially, this would result in further confusion for companies operating on both sides of the border. We would like to suggest that EPA consider and adopt the following recommendations as criteria for Version 6.0.

b.

CLIMATE ZONE	MAXIMUM U-FACTOR	MAXIMUM SHGC
Northern	0.28	Any
North- Central	0.30	0.40
South-Central	0.32	.25
Southern	0.40	0.25

3- Condensation Resistance

We would like to caution EPA in the unintended consequences of driving requirements to more stringent levels. We fear that driving more stringent numbers without introducing a parameter for condensation resistance in the Northern Climate Zone will encourage the use of surface 4 Low-E products creating products that have great U-Factors but run the same risks for condensation as clear/clear insulated glass – non ENERGY STAR qualified products. The unintended consequence of driving requirements to more stringent levels without introducing other parameters will cause more consumers in the Northern Climate Zone to experience condensation and ice formation problems on their ENERGY STAR qualified products.

Introducing a CR value of > 50 as a mandatory requirement for ENERGY STAR qualified windows in the Northern Zone would effectively "recognize the highest-performing doubles and bring a greater number of triple pane windows into the mainstream" as your proposal states. We feel that this added requirement is the solution to maintain the integrity of the ENERGY STAR program. Please find enclosed a document enclosed entitled: The effects of surface 4 Low-E Coatings on Fenestration Condensation Resistance.

4- Proposed Revisions to Product Criteria

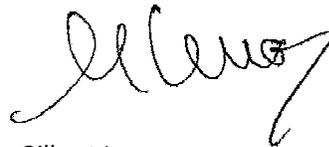
b. Doors

1. Sliding Glass Patio doors would be particularly challenged under EPA's new proposal which would effectively shut out most current Wood and Wood Clad Sliding and Swinging Patio doors. The added cost incurred from sliding door manufacturers to modify their systems to accommodate triple pane would result in an unfair advantage for insulated door who can accommodate triple pane with no significant change to all other components to their systems. This could result in a shift from Sliding Patio Doors –regardless of the material – to a shift to Insulated Steel or Fiberglass Swinging Patio Doors.

In an effort to reduce any undue stress to one sector of our industry in favor of another, we believe it would be prudent to have door criteria remain at their current levels.

We wish to thank you for the opportunity to submit comment and appreciate any and all considerations EPA may bring to our concerns.

Kind regards,



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