



AMERICAN
ARCHITECTURAL
MANUFACTURERS
ASSOCIATION

March 28, 2003

Mr. Richard Karney, P.E.
ENERGY STAR Program
U.S. Department Of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Rich:

Based on the comments received from our membership, the proposed 3-zone Energy Star window criteria is the preferred option. While both options had positive and negative implications, the simplicity of ease of implementation of the 3-zone approach was the dominant reason of support.

AAMA membership is representative of the entire U.S. marketplace and therefore is comprised of many different manufacturers and suppliers. These companies vary by size, product types, framing materials, and geographic interest. At last count, comments from 17 AAMA members had been posted on the Energy Star window specification web page. The opinions expressed are diverse and we do not envy the challenge before the U.S. DOE in reconciling the thoughtful alternative criteria and approaches recommended by the respondents.

While the 3-zone option was preferred by the majority of AAMA respondents, this option presents aluminum window manufacturers with very limited compliance options. Another recurring concern is the exclusion or diminished importance of high solar gain products. The U.S. DOE should address these concerns to determine if there are different options or approaches that would mitigate these issues without compromising the energy savings goals and growth of the program.

The majority of our members support the **ENERGY STAR** Program. We hope that the next set of window criteria motivate all members of our industry to jump on the **ENERGY STAR** bandwagon. Thank you for considering our comments.

Sincerely,

Richard G. Walker
Executive Vice President

cc: Chris Fuldner EFCO
Ray Garries Jeld-Wen
Paul Warner Mikron Industries