



March 27, 2003

Mr. Richard H. Karney, P.E., Manager
ENERGY STAR Program
Building Technologies Program
U.S. Department of Energy

Dear Mr. Karney:

I am writing to formally communicate the position of Andersen Corporation in response to your February 11th, 2003 request for comments on the two alternative proposals for Energy Star Windows, Doors, and Skylights. After careful review of both alternatives, we have decided to support the three-zone proposal.

While both proposals should result in energy savings over both IECC 2000 and the current Energy Star program, the three zone alternative is simpler, and therefore easier for the consumer to use. It is our belief that the difference in total energy savings between the two plans is marginal, while the three-zone proposal should have a bigger influence on reducing peak electrical demand, maximizing the associated environmental benefits. Summertime occupant comfort is enhanced with the low solar gain requirements of the three zone proposal. In addition, it has potential to lower first costs by downsizing or “right-sizing air conditioners and lower utility costs through reduced air conditioner use.

The suggested implementation time is also of some concern to Andersen. The time and effort to implement a widespread label and literature change in our manufacturing environment is significant, and Andersen respectfully requests that consideration be given to extending the implementation deadline to December 31, 2003. We offer a suggestion of allowing manufacturers to change labels and literature effective immediately upon formal announcement, but propose a sunset date of December 31, 2003 for reference to any existing (soon to be old) criteria.

Lastly, but importantly, we request that the DOE specify that the inclusion of the Energy Star map on the label is optional. It is our belief that the map is an important point-of purchase tool for the consumer when selection based on geographic location is known, (such as in product literature) but has little or no real value on the actual label, where the growing need for product performance information being requested by building officials exceeds an already limited space. We are proposing that in lieu of the map, we would still display the Energy Star logo and text indicating compliance to the zone criteria (e.g. “This window complies in all climate zones.”).

Please feel free to contact me if you have any questions or need further clarification.

Respectfully,

Steve Johnson
Regulatory Affairs and Technical Marketing Manager
Andersen Corporation
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