

From: [mbabrams@earthlink.net](mailto:mbabrams@earthlink.net)

To: [richard.karney@ee.doe.gov](mailto:richard.karney@ee.doe.gov)

Sent: 03/26/2003 06:36 PM

Subject: ENERGY STAR Windows Criteria Proposed Changes

Dear Mr. Karney,

I am writing to express my concern that adoption of the 3-zone option proposed in the DOE's February 11, 2003 announcement fails to maximize overall energy savings in the U.S., and would create an effective monopoly in the marketplace. Instead, I would encourage the Department to adopt the 4-zone criteria for the ENERGY STAR Windows program. This map saves more overall energy, maintains competition in the marketplace, and allows for lower home heating costs for consumers.

- The 3-zone criteria will eliminate pyrolytic technology in the marketplace. I oppose the 3-zone proposal and support the 4-zone proposal for the following reasons:
- The 3-zone proposal will create a monopoly in the marketplace by eliminating the use of pyrolytic Low-E glass. The elimination of this technology will reduce consumer choice on energy efficient products and increase consumer home heating costs. At a time when natural gas prices are at a record high, this is not appropriate. The 4-zone proposal maintains a competitive marketplace for all types of high-performance Low-E glass as well as the jobs that deliver such technology to the marketplace.
- The 4-zone proposal saves more energy than the 3-zone proposal as evidenced by your own supporting documentation.
- The 3-zone is the exact same proposal your agency withdrew last year after numerous objections were raised by Members of Congress and industry members. Conversely, the map of the 4-zone proposal outlines the substantial climate analysis conducted by the DOE and puts that understanding into practice.

In closing, I believe that the ENERGY STAR Windows program should recognize the overall energy efficiency of pyrolytic Low-E glass. On this basis, DOE's proposed 3-zone criteria should not be adopted. The Department of Energy should adopt the 4-zone proposal. This 4-zone map both provides greater overall energy savings and encourages a competitive marketplace that will drive technology into the future.

Sincerely,

Michael B. Abrams