Richard H. Karney, PE., Manager 3/28/03  
Energy Star Program  
Building Technologies Program  
Department of Energy  
Washington, DC 20585

Here at The Pacesetter Corporation we favor the four-zone proposal.

If you look at both the four zone and the three zone maps you can see how the four zones makes much more sense. In the three-zone map, cities such as Atlanta have the same requirement as Philadelphia. Philadelphia would benefit greatly from solar gain, saving on heating costs in the winter, and Atlanta would gain in reduced solar gain in the warmer months.

The four-zone proposal maintains a competitive market place for Low-E glass purchases. This is very important for us manufacturers in staying competitive in an already very competitive market place. It also gives manufacturers the ability to tune products for certain market areas.

The three-zone proposal would create a very limited availability of types of Low E that could be used in certain areas of the country. This would eliminate pyrolitic Low-E products, which can have a positive effect in northern areas providing more solar gain. This takes the competition out of the market place giving the much larger companies the benefit. But is the consumer getting what they should for their area?
Does Atlanta have the same requirements as Philadelphia as far as solar heat gain goes? The answer is no.

Pyrolytic Low-E take less energy to produce than the sputter or soft coats. Sputter coats can take as much as 9 times more energy to manufacturer than pyrolytic. For the manufacturer of windows, soft coats raise costs greatly. Machinery to produce sputter/soft coat glass can be as high as $150,000.00. Each piece of glass must be handled four times, 16 times per window and handling costs in the factory also go up greatly because of the sensitivity of soft coat.

We know that the decision made now is difficult and could be far reaching. Here at The Pacesetter Corporation the decision seems to be only one way it could go, and that is for the four-zone proposal. This meets the purpose of Energy Star, to save energy. The four-zone proposal keeps good competition in the market place.

Sincerely

Matthew C. Lamb
The Pacesetter Corporation