

From: titaliano@dycwindows.com
To: richard.karney@ee.doe.gov
Sent: 03/18/2003 09:53 AM

Subject: Energy Star Criteria

Mr. Karney,

We manufacture both thermally broken aluminum windows and vinyl windows for primarily the replacement window markets in the South Central States. We are currently participating in your Program. This email supplements our February letter to you, and we also sent a letter outlining our concerns to our U.S. Senator, copy attached.

To summarize, using "you" as a generic reference to the Energy Star Program and not "you" personally:

1. SHGC at .40 is fair, since low-e glass that enables manufacturers of all types of windows to compete on a level playing field is readily available from many sources. We support this standard without reservation because it does not hinder fair trade.

2. We recommend a U-factor of .50 in the Central Zone, whether on a four or three zone map. This level of performance represents a more reasonable "middle ground" between the Northern and Southern zones than you have repeatedly proposed. Whether four or three zones, you continue to make very little distinction in U-factor between Central and North. At face value this appears unfair and exclusive of those of us who invested significant capital in engineered improvements to conventional aluminum window lineals that offer measurable added value - including much better U-factor performance than unimproved aluminum windows. Our recommendation would not restrict legitimately engineered and NFRC-validated thermally broken aluminum windows to compete in your Program against their formidable vinyl and wood competitors in non-thermal areas, for example, durability, strength, colors, tolerances, air and water infiltration, mulling, operation, availability, price, ect. Unfortunately, it appears that Energy Star seeks to exclude all aluminum windows from its Program north of its declared Southern Zone. Unless you present hard evidence justifying absolutely no distinction whatsoever between Central and Northern U-factors while you concurrently distinguish significantly between Central and South, one would indeed have an "argument" that your Program discriminates against aluminum windows and results in unfair trade.

Thank you for seeking our feedback.

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February 25, 2003

SENATOR KAY BAILEY HUTCHISON

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Honorable Senator;

This letter follows up my letter to you dated 6/6/02. Since, our friends at DOE's Energy Star have re-submitted a new proposal for public comment in response to significant public and industry challenges after their first proposal. If you had anything to do with their reconsideration, thank you. We currently participate in their program and share many of its stated goals.

However, their new proposal isn't "new" at all. It makes no change in U-Factor throughout our region. Why do they insist on the same window U-Factor in Austin as St. Louis? Why do they insist on a thermal performance measure that no aluminum window can reasonably meet, even thermally improved aluminum designs?

It appears to me that Energy Star has decided to ensure that no aluminum window of any design is allowed to join their exclusive program. We think their standards are clearly intended to exclude aluminum in favor of vinyl and wood. Their effort is unfair to the thousands of people in your constituency that earn a living from the manufacture and distribution and installation of aluminum windows and doors. It is unfair to those of us who invested significant capital to engineer thermal improvements to our frame that results in impressive thermal improvements to our window when contrasted to unimproved aluminum. It will also increase prices your constituency will pay for windows and doors, with the promise of energy savings dubiously attached to a UFactor very near what thermally-improved aluminum windows could meet.

The compliant U-Factor should be changed to .55 or higher in areas where thermally broken aluminum windows can be reasonably expected to afford energy savings to consumers. Why do they jump from .75 to .40 in U-Factor somewhere around San Antonio? Why is no other regional variance near as large? The difference in energy savings between their .40 and our suggested .55 is not proven to be significant enough to justify the extinction of the aluminum window industry. In a book published with assisted funding from the DOE, Residential Window Guide to New Technologies and Energy Performance, "*energy loss through the frame is minimal, especially in the South*". We recognize that a

reasonably high standard is the point to Energy Star, but the standard should not be so high as to exclude an entire class of product from the free market. It is important to remember that U-Factor is only one consideration of a window's thermal performance. Any window with a terrific U-Factor is of little value if it rots in a few years, warps or cracks over time, or allows air leaks beyond what another, higher U-Factor window might leak.

SHGC is correctly set at .40. This is a number easily achieved with sputter-coat low-emissivity glass that can be glazed to any window frame. We agree that, in warmer Southern climates, where more energy dollars are spent on cooling a home than on heating it, the reduction of solar heat gain is virtuous – especially since the necessary glass is readily available to all of us in the business. It excludes no competitor.

Thermally broken aluminum windows are legitimate, and they offer very good thermal performance. When combined with low-e glass and argon, they can be tested to within ten to fifteen points or less of the Energy Star's apparently non-negotiable .40 U-Factor. You might be able to help us earn consideration for the distinction between standard, conventional aluminum windows and thermally broken aluminum windows. All we ask is a fair playing field. Senator, please do not let them exclude us from their program.

Sincerely,

Randy Hoover,
Sales Manager

cc: Richard.Karney@ee.doe.gov