



March 24, 2003

Mr. Richard H. Karney, P.E.  
ENERGY STAR Program  
Washington, DC 20585

Dear Mr. Karney,

This letter is to follow up on our letter dated May 30, 2002 and to reiterate our position on the latest Energy Star proposals.

Windowmaster Products is a regional window manufacturer that supplies high quality aluminum and vinyl windows, primarily to the Southern California and Arizona markets. We have been an "Energy Star" Partner since 1998 and were voted "Energy Star Regional Window Partner of the Year" in 1999. The majority of the windows we sell meet current "Energy Star" standards and we aggressively promote the Energy Star program in our marketing effort. Therefore, Windowmaster Products has a strong interest in the direction that the Energy Star program is heading and we have been monitoring the evolution of the program and the new proposals for some time.

Having reviewed the latest proposals, our position is unchanged. We still have major concerns with the accuracy of the climate zone maps that have been proposed. We understand that the proposed boundaries for the latest map were based on a study of "Heating Degree-Days" (HDD) for the different geographic regions of the United States. After reviewing the IECC map in your publication labeled "Map 1: IECC Replacement Window Climate Zones", we realized that the majority of our sales territory (Southern California and Arizona) is in the "0-1999 HDD" classification. However, when we look at all the proposed Energy Star maps, this large portion of Southern California and Arizona that appears on the IECC map in the "0-1999 HDD" classification has now been lumped into the 2000-6000 HDD classification of the Central Zone! How did this happen? This completely contradicts the technical data and the rationale used in creating the climate zones.

If you read the description of the Southern Region in Richard Karney's letter from the DOE dated May 8, 2002, it fits the Southern California/Arizona region like a glove. It describes "the new definition of the Southern Region, below 2,000 HDD" and goes on to state, "One technology the Department gave particular attention was aluminum products. DOE believes that aluminum product manufacturers will be able to supply products meeting this requirement. The emphasis on the Southern Region criteria is on reducing cooling load demands for the extreme south." Again this hits home with the products we sell in our region. Cooling load demands and solar heat gain are certainly the main issues to our customers when we upsell our customers to Low-E glazing. If the Low-E glass we sell in our product did not offer improved SHGC values to address cooling load demands, our Low-E sales would be almost non-existent.

Windowmaster Products is comfortable with the .40 SHGC to meet the cooling load demands. However, we think Energy Star has incorrectly moved Southern California and Southern

Arizona into the Central Region. By forcing manufacturers to meet a .40 U-factor, this forces aluminum products out of the Energy Star program in these regions. The same reasons for maintaining a .65 U-factor in the new proposed "Southern Region" certainly apply to the Southern California/Southern Arizona region also. The new proposed map creates a double standard, unfairly penalizing southwestern aluminum manufacturers while rewarding southeastern aluminum manufacturers.

No scientific technical data supports putting Los Angeles, Las Vegas, Phoenix and Palm Springs in the same climate zone as New York. These cities represent the hottest growing building regions in the United States. Make no mistake that these cities have a great demand for aluminum windows for a number of reasons. Advantages of aluminum include structural integrity, long term durability, resistance to extreme temperatures and color availability.

For these reasons, aluminum windows will continue to maintain a strong market share in the southwestern United States regardless whether you provide the consumer an Energy Star rated window with Low-E glazing or not. The inconsistency of the Energy Star map and the IECC HDD data will result in less Low-E glass being sold in aluminum products in the southwestern United States, the hottest growing region in the nation.

Windowmaster Products understands the need for Energy Star to continue to set performance standards that meet or exceed the state and local codes. The .65 U-factor required by Energy Star in the Southern Region meets the .65 U-Factor required by the CEC. If the only reason to exclude the southwestern United States from the Southern Region is the feeling that Energy Star has to be better than the .65 U-factor required by CEC, then that is wrong. If the only reason is to have a pretty map with nice continuous geographic lines, then that is also wrong.

In conclusion, the new proposed Energy Star climate zone map is wrong. It unfairly penalizes window manufacturers that supply aluminum windows to the southwestern United States by excluding them from the program. We recommend that Energy Star revisit the boundaries of the latest climate zone map and include the southwestern United States in the Southern Region. The HDD data for this region as shown on the IECC map is so conclusive that a decision by Energy Star to not change the proposed maps would be an injustice to the window manufacturers and consumers in this region. The integrity of the Energy Star program would be compromised if the map were left unchanged. The D.O.E. and Energy Star should also be concerned with the potential liability they would be exposing themselves to by endorsing a map that is not supported by scientific data.

Let us know if you would like us to answer any questions or discuss our position further.

Thank you for your consideration.

Sincerely,

Ron Walker  
President/C.E.O.  
Windowmaster Products