



To: Environmental Protection Agency
From: Bill Tindell -Windsor Windows & Doors
-Monarch Windows
-Atrium Patio Doors by Woodgrain
Date: 11/15/11
RE: Energy Star v6.0 Criteria Feedback

Thank you for the opportunity to provide feedback as it relates to EPA's Energy Star Version 6.0 for Windows, Doors and Skylights. I represent Windsor Windows & Doors, Monarch Windows, and Atrium Patio Doors by Woodgrain.

Section II.b. Products Installed at High Altitude

We are not in support of eliminating this provision from the draft criteria and feels there should be separate criteria for products installed at high altitudes. The EPA claims there are a "small number of products ultimately installed at high altitudes." Over 27% of Windsor's aluminum clad wood products are installed at high altitudes thus requiring a breather tube. This is significant volume on a product also affected by the very aggressive recommended changes in thermal performance. The EPA goes on to state, "Recently some manufacturers identified other ways to handle the problems brought on by the changes in pressure." The EPA fails to point out what these "other ways to handle the problem" are. Are they proven? Are they cost effective? Are they commercially viable?

Section II.c. Impact Resistant Products

We are not in support of eliminating this provision from the draft criteria and feels there should be accommodations made for impact resistant products. This is a market that continues to grow and expand not only along the coast, but inland as well. Impact products are typically more expensive due to the impact resistant glazings and without different criteria these product would become cost prohibitive to the end user.

Section IV.a. Air Leakage

We support this addition to the criteria but would like to see verbiage added to the NFRC 400 language to adopt the AAMA 101 standard.

Section V.a.b. Proposed Revisions to the Product Criteria

Overall we feel the adjustments in U-Value for windows and doors in the Northern, North-Central and South-Central zones are too aggressive and quite frankly, not needed at this time. In performing a RESFEN calculation for a 2000 sq ft home in Des Moines, Iowa with 300 sq ft of windows (15%), the annual energy savings for window performance going from a .30 U-Value to a .25 U-Value is only \$30. This is simply not enough savings to justify such a dramatic adjustment in the thermal performance thresholds, and given the consumer's cost of the technology required to meet the proposed levels, the consumer's return on investment is not compelling if not negative.

Section VI. Tentative Timeline

The initial draft report was received from the EPA in October 2011. The final program requirements will not be published until September 2012, one year later. The new program criteria is due to take effect in the fall of 2013. The EPA is taking one whole year to develop the criteria, yet only giving manufacturers who in many cases will be required to completely redesign, proto-type, test, tool up and ramp up production on potentially multiple product lines the same one year time frame. This simply is not enough time to essentially develop and market multiple new products.

While the short time from final program requirements to implementation is a concern, of equal concern is the major capital investment that will be required in the research, development and introduction of the many new product changes required for compliance. The housing market has been in a depression for more than 3 years and it is anticipated it will last at least 2 – 3 years into the future. Now is not the time for these drastic changes to the Energy Star program. Manufacturers need to remain focused on improving operations and keeping our workforce employed. This will force companies like Windsor, Monarch and Atrium Patio Doors to dilute its resources in research, development and make additional capital investment just to maintain our sales base. In discussions with customers, they are not asking for and are not willing to pay for these thermal improvements. This is not the right time to make these drastic changes to the Energy Star criteria.