



Comments on Draft 1 of the ENERGY STAR for Windows, Doors, and Skylights Version 6.0 Specification

**Respectfully Submitted by the Association of Millwork Distributors (AMD)
September 28, 2012**

Representing the largest segment of side-hinged exterior door pre-hangers, distributors, and component manufacturers in the United States, AMD welcomes the opportunity to comment on the Draft 1 of the Energy Star for Windows, Doors, and Skylights Version 6.0 Specification released July 26, 2012 by the U.S. Environmental Protection Agency (EPA).

The comments below relate to the definition of glazing categories for doors and the U-factor requirements for ½ lite doors.

Definition of ≤ ½ Lite as being ≤ 29.8% glazing; Definition of > ½ Lite as being > 29.8% glazing

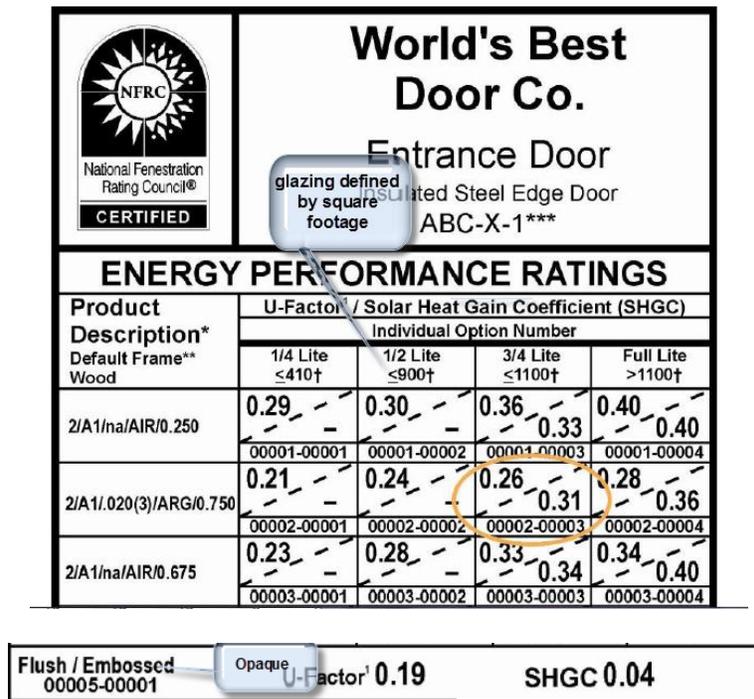
Comment: Percentages are not used in the industry to define area of glazing. The NFRC 100 does not reference percentages either. And even if one were to calculate percentages based on the NFRC standard sizes and square footage of glazing area, none of the calculations come to 29.8% glazing. Perhaps this is an average percentage that is being referenced? This will add a great deal of confusion to the industry and consumers alike because another measurement criterion is being used. The NFRC Door Label references glazing area by square footage in the categories of ¼ lite, ½ lite, ¾ lite and full lite, which is based on the NFRC 100.

Recommendation: Replace the percentage reference with reference to glazing area by square footage as defined in Table 5-1 of the NFRC 100 and the NFRC Door Label. Energy Star should recognize the glazing categories as defined by NFRC:

Table 5-1 – Glazing and Divider Patterns for Doors

Individual Product	For Doors with	Simulated or Test as	Optional Caming Pattern
1/4 glazing	< 0.265 m ² (410 in ²)	560 mm x 480 mm (22 in x 19 in)	5 vertical 1 horizontal
1/2 glazing	0.265 m ² -0.581 m ² (410-900 in ²)	560 mm x 915 mm (22 in x 36 in)	5 vertical 8 horizontal
3/4 glazing	0.581 m ² -0.710 m ² (900-1100 in ²)	560 mm x 1270 mm (22 in x 50 in)	5 vertical 10 horizontal
Full glazing	0.710 m ² (1100 in ²) or more	560 mm x 1625 mm (22 in x 64 in)	5 vertical 13 horizontal

Figure A-2A
Sample Temporary Door Matrix Label (2011)



U-factors for Full Lite and Half Lite Doors with the Same IG Construction

Comment: The full lite and ½ lite U-Factor requirements for Energy Star qualification are not consistent. The qualifying insulating glass (IG) unit on a full lite does not meet Energy Star qualification as a ½ lite. This should not be the case.

An opaque door meeting Energy Star with a U-factor of .17, uses a specific IG unit for the full lite to get an Energy Star qualified U-factor of .30. But this same IG unit installed in the same opaque door as a ½ lite configuration would have a .25 U-factor, which will not meet Energy Star’s Version 6.0 ½ lite requirement of .23. This means that a different, perhaps more costly, IG unit would need to be used on the same opaque door to meet Energy Star performance requirements; or perhaps that a completely different door would be required to be purchased to meet the .23 requirement. Consumers seeking uniformity in their exterior doors but also seeking Energy Star products would find themselves purchasing glazing units of different tints or purchasing different doors altogether.

As ODL, an AMD member, pointed out at the stakeholder meeting in Washington this past August, there are many examples in the NFRC Certified Products Directory (CPD) that reflects this inconsistency: opaque doors with a .17 U-factor and a .30 U-factor in full lite, results in a ½ lite U-factor of .25. To meet a .23 U-factor rating at ½ lite, one would need to look at another product option altogether.

Recommendation: To maintain consistency, qualify ½ lite door U-factors at .25 instead of .23. An Energy Star opaque door with a .17 U-factor should be able to use the same glazing technology for its full lite and ½ lite options to meet Energy Star energy efficiency requirements.

Installation Instructions

Comment: AMD agrees with EPA that installation instructions should be made available to consumers and installers but has concerns regarding one of the elements Energy Star would require in installation instructions; specifically, the element that refers to “general guidance on safely removing old products” and the “proper management of lead paint.” This requirement, in essence, puts the manufacturer in a position of having to take responsibility or assume the liability for the existing door or window in a replacement installation.

Recommendation: Revise this element as set forth in 3.D.iii of the Draft 1 Version 6.0 Specification, and have it read as follows: “General guidance on preparing the frame for installation.”