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Comments Relating to Energy Star Request regarding Proposed Most Efficient Recognition Criteria for 2020

August 19, 2019 - While AWDI appreciates the work and mission in pursuit of the Most Efficient Windows for 2020, the effort is somewhat without merit unless clarifications are made, and consumers can realize the performance. We all know dealers will brag and promise. Why allow that when it can't be given?

In 2012, The Federal Trade Commission fined 6 quality window manufacturers for “misleading” consumers by quoting savings that the new windows could be expected to achieve commensurate with the tested R-values, etc. actually supported by the Efficient Windows Collaborative website. The FTC said in their ruling: ***“Window Marketers Settle FTC Charges That They Made Deceptive Energy Efficiency and Cost Savings Claims. Thereby demanding “Companies Must Have Scientific Evidence Before Making Marketing Claims.”***

Why would undeliverable R-5 be different? If a fenestration product achieves a tested U-factor of less than or equal to 0.20 across climate zones, as required for most efficient, then it would be disingenuous for any manufacturer to promote such an R-5 window when it cannot even deliver R-5 in the home using current ASTM recommendations for installation – without Scientific Evidence. There is no evidence. **R-5 Windows cannot achieve those results in service using today's prescriptive installation methods for replacement.**

To find a possible solution, AWDI worked with European component suppliers who routinely achieve R-5 window installations or better – without increasing air and water infiltration. They achieve this result by neutralizing the issues causing the problems here such as avoiding conventional shims, and avoiding air and moisture transmission of normally used foams and sealants.

AWDI tested windows that would have met the 2020 Most Efficient standards. The units were identical and non-operating to avoid weather-stripping leaks. These tests were done using current protocols at NCTL in York, PA and at MPA/BAU in Hannover, Germany. Both test series (ASTM 2112 and AWDI's R-5) produced similar results: 2112- produced an in-service performance of R-2.346. AWDI's protocol produced in-service performance of R-5.077. Same window. Same opening. AWDI even challenged skeptical US component suppliers to duplicate, and they couldn't — even though they implied guarantees. If the opening gap is sealed (as would be the case in the lab) other problems will cause rot, mold, etc. Because making windows too tight, invites air and water infiltration around the window.

What's the purpose in designating a most efficient window at R-5 when it can't be achieved when installed without guidance? To add Patio Doors with their own set of installation caveats is not helpful either. If “Most Efficient” doesn't include simple caveats by the manufacturer and/or EnergyStar® as to achievability in the home, then the Federal Trade Commission has their work cut out for them – again. More thought must be given to the claims implied and/or inferred from the tested numbers of 2020 “Most Efficient.”

Regards,
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