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**Comments relating to Energy Star Final Draft Version 6.0 – Program Requirements Product Specification for Residential Windows, Doors and Skylights**

AWDI appreciates the work that has gone into not only the drafting of Directive 6, but the refinement of the various recommendations contained in the final draft criteria as well.

However, the majority of the work and comments centered on the performance aspects of Version 6 and not on the efficacy of on-line, consumer facing web pages containing applicable installation instructions suitable for the manufacturer's products.

As the attached graphic shows, improper installation at the mass-market level of replacement is causing not only energy loss but also major damage to the homes where improper installation occurs.

Replacement is unregulated for the most part, allowing grandfathered construction when the opening size is not changed. No one controls the install. Best practices need to be distributed – now!

The information for proper installation exists now, and the content is not being challenged. It's just not being distributed to the independent installers and contractors and building departments. Therefore it seems counter to the stated goals of the EPA, DOE and Energy Star to allow another year to go by and another million or so problems to be created, energy wasted, and manufacturers compromised accordingly, by not requiring, perhaps rewarding or at least encouraging manufacturers to begin the posting of the instructions beginning January 1, 2013. Many are ready. Why wait? The Directive separated instructions into a distinct category. Instructions are not dependent on any other portion of the directive, at all.

If requirement is not possible, reward certainly is. There should at least be the ability for a manufacturer to promote that they are EPA Directive 6 compliant with regard to the instructions and use that fact to gain a competitive edge over their competition. EPA, DOE and Energy Star needs to support that now.

Unlike product changes that are, in essence, instant when they are made, posted guidelines, recommendations and best practices take time to filter into the market. It will take quite a while for these instructions to become wide spread in use. To delay the opportunity for them to reach the marketplace until 2014 seems not only counterproductive, but a waste of the opportunity that exists.  
Sincerely

  
John H. Jervis  
Executive Director

Eventually “*Caulk ‘n’ Walk*” installation will show why our competitor charges so little.

