

AMERICAN WHOLESALE Ltd.
P.O. Box 411
Malvern, PA 19355

CHUCK CAMPBELL
EXECUTIVE DIRECTOR

February 4, 2013

To: windows@energystar.gov

Draft 2 Version 6.0 ENERGY STAR® Specification for Windows, Doors, and Skylights

I am President of a group of over 300 Building Material retailers across the US. We are one of the leading sellers of skylights and roofing products to the Professional and Do-it-yourself market. After reviewing the proposed v6.0 standards for skylights, I felt it was important to comment.

Energy efficiency is important to our customers and to us! We have encouraged our customers to seek out ENERGY STAR qualified products in our broad product assortment. In addition, we have encouraged the roofing market to replace older plastic and less efficient skylights, with new ENERGY STAR skylights every time a roof is replaced.

So, when we began to investigate the new ENERGY STAR v6.0 criteria, we were surprised to discover that the EPA's own analysis reveals that our customers will pay over \$30 more than the cost of skylights that meet the current standards. Also, in your analysis, the payback is over 30 years. With the average homeowner in a home for seven years, this doesn't seem right. Our customers have been willing to pay more for energy efficient products with a reasonable payback period but this seems unreasonable.

We believe this added cost will reduce the number of homeowners who buy energy efficient skylights, as the return on investment is too great. In addition, it seems to defeat the initial purposes of establishing the ENERGY STAR criteria.

The result of this change will likely reduce or eliminate ENERGY STAR qualified products in most of our retail dealers. As I have understood in the past, ENERGY STAR wanted to support energy efficient products that are readily available in the market. This new standard will likely change that position.

Our members encourage you to work closer to the manufacturer to provide a more realistic approach to the important skylight category.

Sincerely,

Chuck Campbell
Executive Director
American Wholesale Limited
