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TO: Doug Anderson  
ENERGY STAR Home Improvement Program  
Environmental Protection Agency  
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On behalf of Associated Materials, LLC (AMI), I would like to thank you for the opportunity to submit our recommendations for the ENERGY STAR® Draft 2 Version 6.0 changes. Associated Materials continues to be committed to providing energy efficient products and services. Partnering with the Environmental Protection Agency (EPA) allows AMI to extend the reach of our products in cooperation with the ENERGY STAR brand.

Below you will find Associated Materials' recommendations regarding the Windows, Doors and Skylights Draft 2 Version 6.0 changes published on January 7, 2013

#### **IMPLEMENTATION TIMELINE**

Associated Materials requests to have the launch date moved out six months, to 7/1/14. Our basis for this request is the level of redesign, retooling and investment required across the industry to develop windows that meet the  $U \leq 0.27$  change and that maximize payback (cost/benefit) for our customers.

This U-value performance level, 0.27, requires substantial development efforts to thermally optimize dual pane designs so that window companies can avoid moving to triple panes or costly 4<sup>th</sup> surface coatings. Under the EPA's current time line the industry will be pressured to make rapid design and investment decisions to meet the tight timeline versus "value engineering" products to drive the best consumer value through cost effective designs and manufacturing approaches. Also, tooling manufacturers are limited in the industry and we are starting to see bottlenecks with extruders, tool manufacturers, insulated glass equipment manufacturers and others process equipment suppliers. The 7/1/14 implementation date proposed by AMI will allow companies needed time to strategically evaluate their current product designs and to optimize product cost impact and investment levels across the range of potential product and technology changes that can be utilized to meet these criteria. The requested increase in implementation time allows for improved designs in the interest of providing better paybacks to our customers and to potentially even exceed the minimum Energy Star standards.

Again, I want to convey our appreciation for the opportunity the EPA has created to promote industry and government cooperation in creating economical, energy saving solutions for our consumers.

Sincerely,

Robert A. Jablonski  
Vice President Product Development & Engineering  
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