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Subject: Comments on 2014 revised Energy Star program
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Here are Champion Window's comments/recommendations regarding the 2014 revised Energy Star Program:

- We applaud your acknowledgement that the NFRC Certified Products Directory (CPD) is not completely representative of products sold; however, using Manufacturer websites to determine products sold - as well as mfr data provided by 8 mfrs may not be accurate either.
- We are confident that D&R International and the EPA want to get this upcoming revision to the Energy Star program correct. We therefore encourage D&R/EPA to get better data to validate the assumption that 80% of windows sold are Energy Star.
- We also agree that the cost effectiveness of windows vs. incremental costs must be evident to consumers – Triple pane windows are NOT cost effective (ES program Guiding Principle #3 – products must have reasonable payback period); that the payback be better aligned to consumer expectations/realistic payback (closer to the current 7 years and not 11-13 years)
- Finally, we urge that the launch of the revised Energy Star program be pushed back to at least January 1, 2015 to accomplish these tasks.

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