

**From:** Koepsel, Steven [coachsrk@suddenlink.net]  
**Sent:** Friday, July 6, 2018 11:19 AM  
**To:** roofproducts@energystar.gov  
**CC:** 'jhill@keystonecerts.com'  
**Subject:** Energy Star (Sunset) roof prodcuts

July 6, 2018

Ms. Ann Bailey  
Chief, ENERGY STAR Labeling Branch  
US Environmental Protection Agency  
Sent Via Email: [roofproducts@energystar.gov](mailto:roofproducts@energystar.gov)

Dear Ms. Bailey:

This email is in response to the EPA's recent proposal to sunset the ENERGY STAR Specification for Roof Products. I am strongly opposed to sunsetting this valuable program.

Our customers rely on ENERGY STAR labeling to communicate the energy efficiency benefits in a simple and clear manner. Relying on building codes and specification is often too complex. If there are problems with the current program, it should be modified not sun setted.

The program offers many benefits to both my company and roof product consumers, including:

- The Program includes third-party certification, which minimizes false performance claims and helps level the playing field. Building codes don't require third-party certification, opening the door to false performance claims by less honest manufacturers.
- My company recently made a considerable investment in testing, certification and marketing to update our products to the new v3 spec. Testing alone takes many years to complete. Three years is not enough time to recoup that investment.
- ENERGY STAR based energy incentive programs have a significant impact on sales. We sell and promote energy-efficient products (in part) because these incentive programs help to drive sales.
- Labeling our products with ENERGY STAR provides a simple way to demonstrate that my company is environmentally conscious and responsible.
- Homeowners and architects often don't understand the details of building codes and specifications, but they recognize and accept ENERGY STAR.
- The ENERGY STAR brand is recognized, trusted and valued by homeowners, building owners and architects. They may not understand building codes and performance metrics of products, but they recognize ENERGY STAR. The program provides a way to differentiate energy efficient products.

- The Program allows me to differentiate my products from my competition. We strive to provide high quality and energy efficient products to customers, and the ENERGY STAR label helps communicate that to customers.
- Without an ENERGY STAR specification for roofs, there is no basis for energy incentive programs like tax credits and utility rebates.

Thank you for the opportunity to provide feedback on this proposal. Please do not sunset the ENERGY STAR Specification for Roof Products.

In a recap about 11 years ago I became interested in Energy Star and became a partner just a little later. I have invested hours upon hours on this program and dollars that cannot be tallied.

Please call me to discuss.

Steven Koepsel  
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