



August 31, 2017

Doug Anderson
Project Manager
U.S. Environmental Protection Agency

Dear Mr. Anderson,

MI Windows and Doors ("MIWD") has received and reviewed the proposed Energy Star draft program for Storm Windows. MIWD had many years of experience building Storm windows and we are very familiar with this product. Based on this experience and our current Energy Star partnership, we suggest the following critical changes to your proposal;

1. EPA, by offering Energy Star certification to after-market Storm windows, is endorsing their use. EPA must then take responsibility for the safe use of these products since the building codes do not. EPA must add to their criteria that Storm glass must meet the ASTM e1300 standard and that the glass tempering requirements in the building code for prime windows must be met.
2. Most Storm windows are Hung products and have inherent safety concerns if panel balancers are not used. A heavy Storm panel can drop quickly and cause substantial injury if it is not tested for this important feature. EPA must require safety Drop testing protocol as seen in the NAFS document.
3. Storm products mounted over prime windows using polymer components can cause these components to fail by the greenhouse effect of very high temperatures. EPA must require a warning be issued to inform homeowners of this concern
4. EPA must require that the certification rules for Storm windows are the same as the rules for Prime windows. Allowing different rules or a reduced stringency creates a market advantage.
5. EPA is promoting the low cost advantage of Storm windows over Prime windows in its justification. Our review of this data shows the Storm window costs overlap the lower end Prime window cost. EPA must not create the impression that Storm windows are always the best choice and let the consumer decide. EPA should promote both Prime window and Storm window Energy Star labeled products.

We would like to thank EPA for the opportunity to comment on these issues. Please feel free to contact us for more detail on these concerns

Thank you,

Ray Garries

A handwritten signature in black ink, appearing to read "Ray Garries".

VP of Engineering and Innovation

