



**To:** Doug Anderson  
U.S. Environmental Protection Agency  
1310 L Street, NW  
Washington, DC 20005

**Date:** September 13, 2013

**From:** Eldred "Tank" Reid  
Codes & Certifications  
[treid@masonite.com](mailto:treid@masonite.com)  
PH: (615) 441-4240

cc: Emily Zachery  
Steve Hopwood  
Steve Schreiber

**Subject: ENERGY STAR® for Windows, Doors, and Skylights-Version 6.0**

Thank you for allowing Masonite the opportunity to provide input regarding Version 6.0 of the ENERGY STAR qualification criteria. As a leader in the side-hinged door industry and an ENERGY STAR Partner, we would like to submit the following comments for your consideration concerning the Final Draft Version 6.0 released on July 31, 2013.

Consistent with our comments submitted on Draft 2, we are disappointed that zone specific criteria is being reintroduced for swinging doors after several years of nationwide criteria. As noted in your responses to comments on Draft 1, the feedback on creating separate, nationwide criteria for swinging doors has been mostly positive. We strongly request that the door criteria NOT take a step backward and return to separate climate zones. This would only serve to create confusion and frustration with the consumer. Consumers of energy efficient door systems have enjoyed simple and concise qualification of door criteria. It would be our recommendation that the full lite SHGC performance criteria be set at one level across the entire United States.

We recognize that solar heat gain is a positive attribute in northern climates and a negative attribute in southern climates. However, all swinging doors that are modeled in accordance with NFRC procedures are done so with less than 50% glazing area. In addition, most are also manufactured with less than 50% glazing area. Swinging doors with less than 50% glazing area (all products as modeled as doors in the NFRC program) may not be subject to IECC prescriptive criteria. Therefore, any advantages based on zone specific SHGC for doors would not overcome the confusion and burden created by eliminating nationwide criteria.

Thank you for your consideration.