



February 8, 2013

To: Environmental Protection Agency

Re: Comments on ENERGY STAR® Program Requirements Product Specification for Windows, Doors and Skylights, Draft 2 Version 6.0

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This letter is in regard to the request for comments on the ENERGY STAR Program Requirements Product Specification for Windows, Doors and Skylights, Draft 2 Version 6.0. Milgard appreciates and fully supports the goal of the EPA to raise the bar for ENERGY STAR to preserve the brand and to encourage energy efficiency through technology and innovation. We would like to provide you with feedback on the Draft 2 of Version 6.0 that was sent to us and to outline what we believe would be the best for the EPA as well as the window, door and skylight industry.

**3.A Energy Efficiency Requirements:**

Window Criteria:

We at Milgard appreciate the ambition of the EPA to achieve energy savings through the lowering of the U-factor and SHGC criteria across the United States. However, through several discussions with other members of AAMA we have decided that the following chart is Milgard’s recommendation for the ENERGY STAR Version 6.0 criteria:

DRAFT CRITERIA FOR WINDOWS				
	ENERGY STAR DRAFT 2 U-Factor	ENERGY STAR DRAFT 2 SHGC	Milgard Recommendation U-Factor	Milgard Recommendation SHGC
Northern	≤ 0.27	Any	≤ 0.28	Any
	= 0.28	≥ 0.32		
	= 0.29	≥ 0.37		
	= 0.30	≥ 0.42		
North-Central	≤ 0.29	≤ 0.40	0.30	≤ 0.40
South-Central	≤ 0.31	≤ 0.25	0.32	≤ 0.25
Southern	≤ 0.40	≤ 0.25	0.40	≤ 0.25

The reasoning behind our decision to raise the thermal requirements for the ENERGY STAR Version 6.0 criteria is because our internal analysis shows that the cost for many manufacturers to reach the Draft 2 proposed criteria will be higher than what is predicted by the EPA resulting in a longer payback for consumers. This was supported by discussions within AAMA and has substantiated a similar response from AAMA as well. We believe that this is deceiving to the consumer and could result in damage to the ENERGY STAR brand.

Door Criteria:

We agree with the EPA’s decision to adjust the U-Factor maximum to 0.25 and this will now allow full-lite and ½ lite doors to use the same glass package. However, to ensure that the window trade-off options included within Draft 2 do not impede the ability to match the glazing color options of doors, we suggest the EPA establish a similar trade-off option for > ½-lite doors in the North Zone, using a U-Factor of 0.32 if the SHGC is ≥ 0.40. This change should significantly reduce the strong possibility of glazing color mismatch of residential fenestration.

DRAFT CRITERIA FOR DOORS					
Glazing Level	ENERGY STAR DRAFT 2 U-Factor	ENERGY STAR DRAFT 2 SHGC		Milgard Recommendation U-Factor	Milgard Recommendation SHGC
Opaque	≤ 0.17	No Rating		≤ 0.19	No Rating
≤ - ½ lite	≤ 0.25	≤ 0.25		≤ 0.25	0.25
		Climate Zone			
>-½ lite	≤ 0.30	Northern North-Central	≤ 0.40	≤ 0.30 trade-off = to 0.32 if SHGC is ≥ = 0.40	≤ 0.30 trade-off equivalent option is ≥ 0.40
		South-Central Southern	≤ 0.25		

**3.C Air Leakage Requirements:**

We ask that EPA recognize that products bearing the AAMA Gold Label have achieved or exceeded ENERGY STAR standards for air leakage values.

The AAMA NAFS Certification and Gold Label certification program tests air leakage and operating force along with durability requirements. By virtue of passing the rigorous structural, water and air leakage testing required by the AAMA Certification Program, each Gold Label product has achieved air leakage requirements at or above the level required by ENERGY STAR 6.0.

**3.D Installation Instructions:**

We at Milgard agree with the need for installation instructions. However, we do not agree with the generic wording within the criteria stating that manufacturers provide “...generic instructions covering the most common situations...” Our concerns are two-fold. First, we are not sure what “common situations” are and how they might be defined by the EPA. We would not want to be operating under the assumption that we have instructions for the most common only to have the EPA inform us that we are not covering an installation type within our instructions that the EPA views as “common”. Second, we also do not want to create instructions for what Milgard views as “common” installation types only to find out that we went beyond what was required. Our resources are limited as with any company in this economy and, due to the time constraints for creating installation instructions, would rather focus only on what is required.

Our recommendation is for the EPA to be more specific with the types of installation instructions required and to reference the ASTM E-2112 document that AAMA

references in the Installation Masters training program. This would provide a clear target for all window, door and skylight manufacturers.

We also recommend that the EPA's request to include information on proper product disposal should also allow manufacturers to similarly direct consumers to [www.epa.gov/recycling](http://www.epa.gov/recycling). It should also be made clear that this information should only be required on websites, and not on product labels.

Please let us know if you have any questions or would like clarity in any of our responses. Thank you for the opportunity to weigh-in on the ENERGY STAR Draft 2 Version 6.0 criteria and we look forward to participating in future communication opportunities.

Best regards,

A handwritten signature in black ink, appearing to read "Kevin D. Vilhauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kevin Vilhauer  
Manager of Testing and Certification  
Milgard Manufacturing, Incorporated