



Pilkington North America, Inc.

811 Madison Avenue
Toledo, OH 43604-5684

Doug Anderson

Program Manager, ENERGY STAR for Exterior and Interior Storm Windows

U.S. Environmental Protection Agency

Anderson.Doug@epa.gov

Brian Booher

D&R International, Ltd.

bbooher@drintl.com

Dear Doug and Brian:

NSG/Pilkington North America, Inc. ("PNA") is pleased to submit the following Comments in support of EPA's Draft 2 for its ENERGY STAR for Exterior and Interior Storm Windows Version 1.0 Specification ("Draft 2 Specification").

PNA agrees with EPA's analysis of the comments submitted to the Draft 1 Specification and its response adopting changes in emissivity levels, solar transmittance and interior storms in the Draft 2 Specification. PNA believes that these changes improve the Draft 2 Specification and, therefore, supports them.

PNA looks forward to working with EPA toward finalization of the criteria.

David Duly

Senior Engineer

Pilkington North America, Inc.