

From: Jim Allardyce, ODL, Inc.

Dear Sirs,

I am replying to your request for comments regarding *ENERGY STAR Program Requirements for Exterior and Interior Storm Doors*.

My question is a bit of a curveball.

Are there ENERGY STAR criteria for Exterior Storm Doors?

If there are no criteria, could Exterior Storm Doors use the same criteria as Exterior Storm Windows?

My argument in favor of this is two-fold:

The definition of an Exterior Storm Window could serve as a reasonable definition of an Exterior Storm Door:

"A fenestration attachment product consisting of a frame component and one or more pieces of glazing, installed over the exterior of a primary window in a residential building."

The definition of a Primary Window could serve as a reasonable definition of an Exterior Glazed Door:

"As assembled unit consisting of a frame/sash component holding one or more pieces of glazing functioning to admit light and/or air into an enclosure and designed for a vertical installation in an external wall of a residential building."

Please share your thoughts with me.

Sincerely,
Jim Allardyce
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