

**From:** [Ray Dill](#)  
**To:** [Emily Zachery](#)  
**Subject:** ODL Comment: 0.45 U-Factor for Tubelight Daylighting Devices  
**Date:** Friday, September 28, 2012 9:15:59 AM  
**Importance:** High

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Emily -

As Final Comments are due today for ENERGY STAR® Program Requirements Product Specification for Residential Windows, Doors, and Skylights Eligibility Criteria Draft 1 Version 6.0, for your consideration, I'm providing a status of product testing and the variations reported at the stakeholders' meeting. This regards EPA EnergyStar proposal of 0.45 U-Factor for Tubular Daylighting Devices (TDD).

The variations in testing, resulting in some manufacturers having extremely low U-Factor values listed on the NFRC Certified Product Directory, are not yet fully resolved. At ODL's urging, the NFRC Executive Committee committed to discussing this during its September 30 Board Meeting in Portland, OR. As ODL's Dave De Block is chairman of the TDD Task Group, this will be a topic at its October 1 meeting in Portland, as well. I expect and anticipate resolution will result, and applicable and timely corrections made.

Testing considerations:

- ODL's product was originally tested after the test lab had made calibration corrections, i.e., ODL's triple layer diffuser attained a 0.46 rating.
- ODL made a revision to its product, retested in September 2012, and now achieve the 0.45 U-Factor proposed by the EPA for Energy Star
- For comparative purposes, ODL had a competitor's product tested at the same time in September 2012. The competitor's product utilizes a dual pane diffuser and tested to a 0.55 U-Factor
- Because of earlier test variations, the competitor's product previous test results were 0.29, and it is listed at 0.29 in the NFRC Certified Product Directory.

Based on product designs and testing, I would anticipate any dual pane diffuser design would not achieve a U-Factor below 0.50. Triple pane diffuser, depending on design, may achieve below 0.50. U-Factors below 0.40 would be suspect.

Please include the above information in your review and analysis. Your continued consideration is appreciated.

I will be attending the NFRC meeting in Portland, OR. If you and/or Dave will be attending, I hope to see you there.

Best regards,

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