



September 6, 2013

Mr. Doug Anderson
US Environmental Protection Agency (6202J)
ENERGY STAR® Home Improvement Program Manager
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Ms. Emily Zachery
D&R International, Ltd.
1300 Spring Street, Suite 500
Silver Spring, Maryland 20910

Dear Mr. Anderson and Ms. Zachery:

Pella Corporation appreciates the opportunity to review EPA's Final Draft criteria proposal for Version 6.0 of the ENERGY STAR® Windows Program. We respectfully submit the following comments for your consideration:

- 1) We thank EPA for their full and thorough consideration of our comments. We recognize that EPA received many comments on various drafts. Reviewing, processing and responding to the comments was clearly an enormous task. Your effort and diligence is appreciated.
- 2) Pella agrees with and supports the proposal to extend the implementation date to January 1, 2015. We agree that this date will give the industry adequate time to successfully prepare for, and transition to, the new criteria.

Related to this, Pella encourages EPA to finalize and communicate the criteria as expeditiously as reasonable. We certainly understand that all due diligence must be exercised. However, the sooner the program updates are finalized and published, the sooner industry can initiate the extensive necessary preparations.

- 3) Pella agrees with and supports the proposal to allow existing certification labels (AAMA, Keystone, NAMI, WDMA) to be used in lieu of displaying air leakage values on the NFRC label. This will provide greater clarity for consumers, and allow manufacturers who participate in these programs to avoid unnecessary redundancy in product labeling.
- 4) In our comments to Draft 2, Pella proposed to establish an energy trade-off option for >1/2-lite doors in the Northern Zone whereby a U-factor ≤ 0.32 may be allowed if the SHGC ≥ 0.40 . We understand EPA is reluctant to accept this recommendation as it would add additional "zonality" for doors. While we appreciate that this may create some additional challenges for an industry segment, we reiterate our proposal to add this essential energy trade-off option for the following reasons:
 - Our proposal is in the best interest of consumers, as it provides a means of avoiding potential glazing color mismatches between windows and doors in the Northern Zone, especially when used in close proximity to each other (for example when a window transom is installed directly above a door).
 - We note that EPA has clarified that transoms are to qualify under the window criteria.
 - As our proposal is restricted to >1/2-lite doors, the impact to the conventional entry door industry is reduced. >1/2-lite doors are much more common to the patio door industry than the entry door industry.

Thank you for your time and consideration. We welcome the opportunity to review these points with you in more detail at your convenience.

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