



February 8, 2013

To: windows@energystar.gov

Simonton Windows offers the following comments and recommendations regarding the (*ENERGY STAR*[®]) *Draft 2, Version 6.0 Product Specification Framework Document* as published by EPA in January 2013:

1. We support the development of Equivalent Energy Performance Criteria for the Northern Energy Star Zone. However, we feel that the implementation date for the Version 6.0 Requirements should be extended to January 01, 2015 to allow for incorporation of technologies targeting Equivalent Energy Performance Criteria. With substantive changes in January 2013, and final criteria due April 2013, there is not adequate lead time for manufacturers to bring products to market.
2. We recommend extension of the Equivalent Energy Performance Criteria to include the North Central Zone with a U-value of 0.30.
3. The EPA points to proper consumer education at the time of sale as a means of addressing any potential issues with condensation. We agree that consumer education is critical to success with 4th surface coatings. We would request that the EPA sponsor the development of a consumer education piece to supplement materials provided by manufacturers and strengthen the message to the consumer.

Sincerely,

Cristen Baca

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