Jeff Inks

Window & Door Manufacturers Association (WDMA)
Introductory Remarks

WDMA member manufacturers:

• Committed to improving energy efficiency of fenestration & achieving efficiency goals for the built environment

• Historically invested and committed to the ENERGY STAR® Program

• Concerned about guiding principles & future of the program
Introductory Remarks

Among issues of particular concern to WDMA member manufacturers:

• Provisions for:
  - Certain Energy Efficiency Requirements & basis for them
  - Air Leakage Requirements
  - Installation Instructions

• Consistent basis for skylight criteria
• Aspects of Analysis Report
• Future revisions & process
• Others
Air Leakage Requirements

• Concurrence with inclusion
• Values appropriate
• Issues with labeling
Installation Instructions

• If a requirement is included, simple is adequate, e.g. manufacturers must provide

• Proposed list of what must be included problematic
  - ambiguous
  - some impractical
  - no compliance measures

• Issue already covered by building code

• Unrealistic to expect industry associations to provide
Analysis Report

• Caution on relying too heavily on Ducker & NFRC database
• Exclusion of triple pane from analysis
• Analysis should be updated
• Others
Guiding principles

• Industry perception/position of the intent of the program
• Concerns over EPA’s perspective and current intent of program
• EPA needs to re-evaluate direction
• Reduction of energy consumption needs to be priority
• Ensuring consumers have sound, reliable guidance on window, door and skylight selection needs to be priority
• Market penetration is not a bad thing
Revision Timing & Process

- Current revision process needs to be maintained
  - Windows, doors & skylights different than other program products
- Frequency of revisions – needs to consider many factors
- Potentially pushing unproven technologies
ENERGY STAR® for Windows, Doors, and Skylights
Version 6.0 – Draft 1
Preliminary WDMA Comments

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