



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

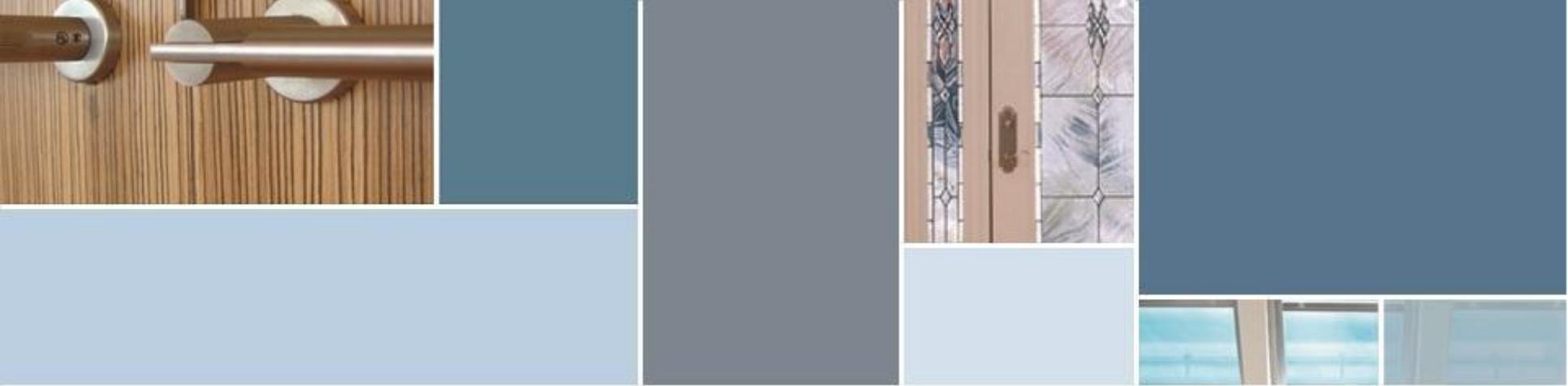
- Caution on relying too heavily on Ducker & NFRC database
- Exclusion of triple pane from analysis
- Analysis should be updated
- Others

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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**ENERGY STAR® for Windows,
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