



February 2, 2017

Doug Anderson
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Brian Booher
D+R International
1100 Wayne Avenue, Suite 700
Silver Spring, Maryland 20910

RE: EPA ENERGY STAR Window Technology Pathways: Methodology for Analyzing Certified Product Data white paper

Dear Doug:

AAMA appreciates the opportunity to respond to the proposed methodology. We have addressed each of the questions posed by the EPA below.

1. Did the EPA combine product characteristics into categories in an appropriate and accurate manner? Yes. AAMA appreciates EPA's efforts in developing this methodology, and believes it to be fundamentally sound and rational.

2. Are there additional key product characteristics that should be included in the pathways? Yes.

AAMA is heartened by the EPA's statement that "...in the future, this methodology may be used in conjunction with other data and analyses as part of specification revisions for the ENERGY STAR for Windows, Doors, and Skylights."

To that point, AAMA strongly believes that any analysis of product characteristics must include an emphasis on cost benefits and paybacks for consumers.

In addition to the five product characteristics proposed by EPA, AAMA suggests that gas fill percentage and IG gap width should also be included. These characteristics often have significant impact on performance ratings, and we ask that EPA give this further consideration.

3. In the absence of a complete list of available product options, will this methodology provide a reasonable proxy to assess product availability? Yes.

AAMA believes this methodology can provide a reasonable proxy. However as AAMA has stated in the past, EPA must consider that of the millions of products listed in NFRC's Certified Products Database, a large percentage of those products are not readily available for consumer purchase. The information may give some indication of the range of products, but many options listed are either not presently being produced, or are produced in low volume as specialty or custom products.

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AAMA appreciates the continuing dialog with EPA on ENERGY STAR development. Please do not hesitate to contact us with any further questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Hanson".

Diana Hanson
Regulatory Affairs Manager
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