



September 6, 2013

Via electronic transmission
mostefficient@energystar.gov

Ms. Ann Bailey, Director
EPA Product Labeling
Washington D.C.

Re: 2014 ENERGY STAR Most Efficient Program

Dear Ms. Bailey:

Thank you for the opportunity to provide comments on the proposed 2014 ENERGY STAR Most Efficient Program. The American Architectural Manufacturers Association represents 300+ member companies involved with the manufacture of residential and commercial window, skylight and door products.

Extending the current program requirements for residential windows throughout 2014, while waiting for the finalization of the ENERGY STAR Version 6 program criteria to be released, is an appropriate action.

However, we do have concerns with several elements of the program as it continues to unfold.

- The ENERGY STAR Most Efficient Program must provide, at minimum, a two-year timeline of planned events. Significant lead time is needed in order for manufacturers, who wish to participate in the Program to retool machines if necessary, alter production schedules, and properly market and ship products. The current method of a late July announcement followed by a September criteria finalization does not afford an adequate lead time for manufacturers to prepare to fully participate in the ENERGY STAR Most Efficient Program.
- The continued exclusion of ENERGY STAR qualified glazed doors and skylights sends a distinct message to consumers that there is no segment of these products that meet the Most Efficient criteria. While it is crucial that the currently proposed ENERGY STAR Version 6 U-factors and SHGC values be properly adjusted prior to any determinations made on the anticipated Most Efficient specifications, it is equally imperative that steps be taken immediately following the release of the revised ENERGY STAR Version 6 criteria to begin any necessary actions to incorporate skylights and glazed doors into the ENERGY STAR Most Efficient Program.
- As the ENERGY STAR Program specifications will be completed by the 2013 year-end, it is appropriate to begin the development of the next phase Most Efficient criteria in early, 2014. This includes the establishment of a comprehensive timeline detailing at a minimum:
 - the release date of EPA proposed program specifications (glazed doors and skylights inclusive);
 - an appropriate stakeholder feedback comment period;
 - the release date of EPA response to comments;
 - a second stakeholder comment period; and
 - the release of the finalized Most Efficient Program specifications.

continued

The American Architectural Manufacturers Association has worked closely with the EPA and D&R International, throughout the development of the ENERGY STAR criteria for the Residential Windows, Skylights and Doors Program.

The established methods of developing the final specifications through interactive meetings and stakeholder feedback periods have proven integral to the tremendous and ongoing success of the ENERGY STAR program. It is imperative that these mutually constructive and effective processes continue to be applied to ensure equal success with the Most Efficient Program.

Thank you.



Richard Walker
President and CEO
American Architectural Manufacturers Association

cc: Doug Anderson, EPA
Emily Zachery, D&R International