

**Comments of AGC Glass Company North America, Inc.
In Support of U.S. Environmental Protection Agency's
Window Technology Pathways**

AGC Glass Company North America, Inc. ("AGC") applauds the U.S. Environmental Protection Agency ("EPA") on its development of the *Window Technology Pathways* ("Pathways"). Pathways clearly has the potential to provide the industry with a quantum leap forward in developing new criteria for Energy Star windows, advancing the application of energy efficient technologies to Energy Star windows, and, reducing the cost of incorporating energy efficient technologies into Energy Star windows.

In the past, AGC has criticized some methodologies used to select window data intended as the basis for proposed Energy Star criteria, or, as the basis for products available to meet proposed Energy Star criteria. In large part, this criticism was based on reoccurring problems related to the overwhelming size of NFRC's Certified Product Directory ("CPD") combined with a lack of any ability to correlate products found in the CPD with products available in the marketplace. AGC sees EPA's Pathway as having the potential for relegating these problems to footnotes in the history of the development of the Energy Star Program.

In response to the three questions posed in the Cover Letter accompanying Pathways, while product characteristics may require some adjustment as products found in the CPD are applied, based on AGC's preliminary review, Pathways appears to provide a fundamentally sound and reasonable proxy to assess product availability. EPA should continue with its analysis of CPD data for 2017.

Additionally, EPA's Cover Letter says that it "can release a spreadsheet analysis with complete performance distributions based on the December 2015 CPD." AGC asks EPA to release that spreadsheet analysis, as it will almost certainly assist AGC and others to further assess, and at an appropriate time apply, Pathways.

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