

**Subject: ENERGY STAR Window Technology Pathways: Methodology for Analyzing Certified Product Data**

My apologies for missing the comment deadline. I thought taking a real vacation was a good idea, and it was but the avalanche when I returned has been huge.

I have concerns that you have not included gap width as a variable you are addressing. While this may be a reasonable assumption for double glazed IG, but in triples air space is an important variable. I am getting requests from manufacturers weekly wanting to know why their triples are the same or worse than their doubles and the answer is that they are building “skinny” triples 1” overall IG or less. Would this methodology be able to distinguish poor triples from good triple where the only difference is the air space dimensions?

Also will you be able to identify interior facing low-e coatings both in doubles and triples as these options while grouped with IG that do not have the interior facing low-e would be outliers in the data.

There is one more class of low-e coating that may cause issues. This is “Turtle Glass” typically double or triple silver low-e with a low vision transmission to stop turtles for seeking out the light of coastal buildings at night.

Again my apologies for the delay in responding and I hope you can include my comments in your review of all the other comments.

Jeff

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Jeff Baker  
WESTLab  
1769 St. Laurent Blvd., Suite 149  
Ottawa, ON K1G 5X7  
Phone: 613-903-9798  
e-mail: [jeff@westlab.net](mailto:jeff@westlab.net)