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**Subject:** [WARNING: SPF validation failed] Comments on the E\* V7 WDS Discussion Guide  
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Thank you for the opportunity to provide feedback on the ENERGY STAR WDS V7 Discussion Guide. We all felt the guide was comprehensive, well-researched and well-written.

The staff at Keystone Certifications (a NFRC Inspection Agency) generally support the various initiatives such as establishing a minimum SHGC for the Northern Climate Zone, moving IECC Zone 5 to the North-Central Climate Zone, and including sliding patio doors in the windows spec. Our comments focus on the potential sunseting of the entry door & skylight products criteria:

18. *Should EPA consider sunseting the ENERGY STAR specification for swinging doors if the analysis does not reveal significant cost-effective energy savings for consumers?*

- Are sidelights and transom products that are only employed in an assembly that includes an entry door being considered in the analysis? Considered as a whole the energy savings for doors, sidelights and transoms may vary significantly from such analysis considering the entry door component only. Also consider that IRC Section N1102.3.3 *Glazed Fenestration Exemption* (see below) is typically applied to sidelights & transoms, creating a greater opportunity for energy savings by making the comparison NOT versus code-specified U-factor & SHGC, but essentially versus unrated single-glazed sidelights & transoms.

**N1102.3.3 (R402.3.3) Glazed fenestration exemption.**  
Not greater than 15 square feet (1.4 m<sup>2</sup>) of glazed fenestration per dwelling unit shall be exempt from the U-factor and SHGC requirements in Section N1102.1.2. This exemption shall not apply to the U-factor alternative in Section N1102.1.4 and the Total UA alternative in Section N1102.1.5.

- Please do not discount the value in consistency for the homeowner and the ability to rely on the ENERGY STAR brand in selecting all the high-performance fenestration products for the home (including windows, doors and skylights).

19. *Should EPA sunset just part the criteria if additional cost-effective energy savings are only possible for some products, such as glass-only doors?*

- Keystone does not support the partial ENERGY STAR applicability to Entry doors (and their sidelight & transom siblings) because it adds complexity to the program while simplicity is key to a successful program!

20. Should EPA consider including skylights in the ENERGY STAR Windows specification?

- Keystone supports the simplification of the Skylight Criteria as opposed to sunseting for the same reasons stated above: consistency for the homeowner and simplicity being key to a successful program.

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