

**Comments of NSG/Pilkington North America, Inc.
In Support of U.S. Environmental Protection Agency's
Window Technology Pathways**

NSG/Pilkington North America, Inc. ("PNA") fully supports the U.S. Environmental Protection Agency's ("EPA") efforts to develop the *Window Technology Pathways* ("Pathways"). Pathways can potentially provide the industry with a new, unique and valuable tool in developing new Energy Star criteria while, at the same time, advancing the application of energy efficient technologies to Energy Star windows at a reduced cost.

In the past, PNA has been critical of some methodologies used to select window data as the basis for proposed Energy Star criteria or product availability. Its criticism was largely based on the sheer size of the NFRC Certified Product Directory ("CPD") and the lack of any reasonable way to correlate products found in the CPD with products available in the marketplace. PNA sees EPA's Pathway as a realistic way to resolve these issues that have dogged the Energy Star Windows Program in the past.

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

Finally, EPA's Cover Letter says that it "can release a spreadsheet analysis with complete performance distributions based on the December 2015 CPD." PNA asks EPA to release that spreadsheet analysis, as it will almost certainly assist in further assessing Pathways.

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