



August 20, 2021

Doug Anderson
Product Manager for Windows, Doors, and Skylights ENERGY STAR Labeled Products
U.S. Environmental Protection Agency

Mr. Anderson,

On behalf of the National Glass Association, thank you for the opportunity to comment on the Draft 1 proposed criteria for Version 7 of the ENERGY STAR program for residential windows, doors, and skylights. NGA has more than 1,700 member companies from across North America and around the globe, covering the entire supply chain of the glazing and glass building products industry from the primary glass manufacturers, glass and metal fabricators, insulating glass manufacturers, fabricators/manufacturers of completed glass products and systems, spacer and other component suppliers, window and door dealers, to the final retail glass businesses and installers/contract glaziers.

We are pleased to see EPA's extensive analysis in the Energy Star requirements, and we are supportive of the proposed criteria. Our members have invested hundreds of millions of dollars over the years to research, develop, and manufacture advanced glazing technologies and products that save energy and promote a sustainable built environment. Our members can provide the glazing products necessary to meet the proposed criteria in *all* zones. We understand some window, door, and skylight manufacturers may require time to adopt and implement the newest technologies into the manufacturing processes, but the technology is available on the market today, and our supplier members are prepared to help their customers in the implementation process when Version 7 takes effect.

With such a diverse membership, we encourage EPA to also review any detailed comments from our individual members, but again, we reiterate that we are in support of EPA's proposed Version 7 of the ENERGY STAR program for residential windows, doors, and skylights.

Sincerely,

Urmilla Sowell

NGA Technical and Advocacy Director

Cc: Nicole Harris, NGA President and CEO

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