



Electronically Submitted: windows@energystar.gov

8/19/2021

Dear Mr. Doug Anderson:

PDS IG Equipment is a supplier of automation and technical services to the insulating glass industry. Our ownership team has over 100 years of experience in this field. We recently reviewed the newly proposed ENERGY STAR Certification for residential windows, doors, & skylights, version 7.0. Our group is fully supportive of the EPA's plan to reduce overall U-factors in residential products.

As long-time participants in the residential insulating glass industry, we have developed and witnessed incredible technological changes that make the proposed U-values quite achievable. We have seen great improvements in low-emissivity coatings and automation innovations tied to fabricating insulating glass. This has created readily available opportunities for insulating glass fabricators to produce high volume, affordable triple pane insulating glass units that can be used by any window manufacturer to meet the performance levels specified in the V7 proposal.

Our company is just one of many that offers proven, scalable automation technology to produce triple pane insulating glass. In fact, the PDS IG system allows for affordable manufacturing of thinner, lighter triples that are more conducive with current narrow sash and frame designs. The great improvements in overall automation throughout the industry has allowed customers to make more repeatable and more durable products. This equates to an increase in window longevity. Homeowners can enjoy these superior windows, both thermally and durability wise, for many more years than in the past.

PDS IG Equipment fully believes previous constraints to affordably produce high performing triple pane insulating glass no longer exist. The glass, sealants, and spacer technology have arrived and are available. Innovative affordable automation products are here as well to allow the greater residential fenestration community to actively meet these new ENERGY STAR requirements. PDS IG Equipment fully supports the version 7.0 ENERGY STAR Proposal. Please contact me if you have any questions about our company, technology or services.

Kind Regards,

Michael S. Rapp

1850 Prairie Street, Prairie du Sac, WI 53578
www.pdsigequipment.com