



February 3, 2017

Mr. Doug Anderson
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Mr. Brian Booher
D&R International, Ltd.
1100 Wayne Avenue, Suite 700
Silver Spring, Maryland 20910

RE: Window Technology Pathways: Methodology for Analyzing Certified Product Data

Dear Mr. Anderson and Mr. Booher:

Pella Corporation is grateful for the opportunity to review EPA's proposed methodology. Overall we believe the proposal to be fundamentally sound and rational. We appreciate the significant thought and effort EPA has put into its development.

Pella suggests that further consideration should be given to the decision to exclude gas fill percentage and IG gap width. We agree these variables may be of lesser impact than the five selected by EPA, but we are not yet convinced they are insignificant enough to exclude.

We understand that this methodology will be used with other data and analyses in developing any specification revisions. We appreciate that, and in particular look forward to understanding EPA's plans for considering product affordability and consumer pay-back in the specification revision process.

Thank you again for the opportunity to review and comment on the proposed methodology. Please feel free to contact us if you would like to further discuss any of these points. We look forward to on-going collaboration with EPA in the specification revision process.

Sincerely,

A handwritten signature in black ink that reads "Joe Hayden". The signature is written in a cursive style and is positioned above the printed name.

Joe Hayden
Sr. Certification Engineer
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