

WDMA - Feedback on Methodology

First, thank you again for the opportunity to review and comment on the proposed Window Technology Pathways. We greatly appreciate the thought and effort EPA has clearly put into developing this new approach to analyzing NFRC product data to assist in future specification revisions. On the whole and based on our review so far, we believe as EPA hopes, that this methodology will indeed accomplish that.

We do also look forward to reviewing this methodology together with the noted spreadsheet analysis that includes the complete performance distribution as derived from the CPD once EPA has released it. That will certainly help us in conducting a more thorough review and providing any additional comments in response. In the meantime, we offer the following comments in response to the questions posed in the methodology document.

Did EPA combine product characteristics into categories in an appropriate and accurate manner?

Again, based upon our review, the approach appears to be fundamentally sound and rational and the combining of product characteristics into the categories as proposed is appropriate and accurate for the stated purposes. However, we do have some reservation about excluding certain characteristics I'll note in response to the second question below. We understand the complexities of the CPD and the challenges in determining a way to use the data appropriately when considering revisions to the window, door, and skylight eligibility requirements so wish to make sure it is as thorough as possible. While there is likely no perfect process, all things considered, we believe this approach is a great improvement over the way this data was considered in the past.

Are there additional key product characteristics that should be included in the pathways?

As noted above, we do have some reservation about excluding certain characteristics, specifically gas fill percentages and IG gap widths. We agree these characteristics generally do have a lesser impact than the five selected by EPA, but are not yet convinced they are insignificant enough to exclude. In that regard, we believe EPA should further consider the decision to exclude gas fill percentages and IG gap width, or if there is additional background/discussion on the matter EPA can provide that could alleviate our concern, we'd appreciate reviewing that.

In the absence of a complete list of available product options, will this methodology provide a reasonable proxy to assess product availability?

As also noted above, while the proposed methodology is a sound improvement, none is perfect or stand alone. In that regard, we are pleased EPA recognizes that, and that other critical data and analysis is equally important when considering future specification revisions. In particular, we look forward to EPA's plans for considering costs as it relates to availability, especially because of the impact that has on affordability and consumer pay-back which, of course, are also must considerations in any specification revision process.

Thank you again for the is opportunity to provide feedback on the proposed methodology and we look forward to further review once we receive the spreadsheet analysis.

Please contact me if you have any questions on the above feedback.

Kind regards.

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