From: David Cohan
Sent: Tuesday, March 24, 2009 7:34 PM
Subject: Criteria Revision - Public

Rich,

Thank you for the opportunity to comment on the revised draft criteria for Energy Star windows. We hope that DOE will carefully re-consider the proposed criteria for the northern tier in light of the strong potential for causing consumer confusion between Energy Star and the tax credits provided by the American Recovery and Reinvestment Act of 2009 (ARRA).

ARRA provides tax credits for windows “equal to or below a U factor of 0.30 and SHGC of 0.30”. Under the proposed criteria, this means that some windows that qualify for Energy Star in the northern tier will qualify for the tax credits while others will not. Having a single northern tier Energy Star criteria that matches the ARRA criteria will make it easy for utilities and public benefits administrators to design simple, effective incentive programs. It will allow window distributors and retailers to easily ally with these programs and communicate the full benefits of purchasing Energy Star windows.

The benefit of providing clarity to the market far outweighs the small energy differences represented in the multiple criteria proposed for the northern tier.

Thank you for your consideration.

--David Cohan

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