Richard Karney & Emily Zachery,

As a green home designer, I find these draft Energy Star criteria for windows, doors and skylights to still miss the mark, and I urge you to continue to refine these to encourage greater energy efficiency and for better options on the market. These criteria are overly simplistic and could possibly even eliminate some better choices from the market as manufactures may only meet the standards and not provide options for passive solar designs. "Tuning" windows for a particular orientation, site and building is an important green home design and building strategy. It is already hard to find good windows that have glazing options that allow for useful tuning as many manufactures make only solar control windows. I thought this article, http://www.usgbc.com/news/EnergyStar20090312.htm, was a good brief summary of these issues. The lack of an air tightness requirement is also of great concern. "Energy Star" has a significant impact in our market place as the official model of energy efficiency and the basis for many policies and programs.

Again, I urge you to continue to develop these for greater energy efficiency and better design options.

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