• The proposed Energy Star door methodology assumes the half light is 50% of the glazing of the full light.

• Using the 50% figure creates the half light as the controlling factor in door glazing. For instance, many full light doors remain Energy Star compliant while identically glazed half light doors fall below the required minimum U factors.
• Recommend utilizing the full glazed and opaque U factors to determine the half light number.
  – simpler for glass manufacturers
  – Simpler for door manufacturers
  – Simpler for distributors
  – Simpler for contractors
  – Simpler for code compliance professionals
Thank you for your time.

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