



Asphalt Roofing Manufacturers Association

750 National Press Building
529 14th Street, NW
Washington, DC 20045

Tel: 202.591.2450

Fax: 202.591.2445

July 11, 2013

Mr. Steve Ryan
Energy Star Roof Products Program Manager
US EPA, Energy Star Program
Office of Air and Radiation
Washington, DC 20460

Via electronic delivery to: Roofs@energystar.gov

Subject: **ENERGY STAR Program Requirements, Draft 3 Version 3.0 Roof Products Specification and Draft 3 Test Method: Maintenance of Solar Reflectance**

Dear Mr. Ryan,

I am writing on behalf of the Asphalt Roofing Manufacturers Association (ARMA) in response to your request for comments by July 12, 2013. ARMA is the trade association representing North American bitumen roofing manufacturing companies and their raw material suppliers. We offer the following for your consideration:

1. Draft 3 Test Method: Maintenance of Solar Reflectance

The current draft of the Test Method states that "at least three (3) measurements of solar reflectance from different areas on each sample" should be completed. ARMA does not believe this amount of samples is adequate for the radiant measurement. As a result, we would like the number of measurements to be increased in order to ensure more accurate results.

Thank you for your consideration of our comments. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Reed B. Hitchcock', is positioned below the 'Sincerely,' text.

Reed B. Hitchcock
ARMA Executive Vice President