

To whom it may concern:

My name is Bob Zabcik and I am the Technical Director of the Cool Metal Roofing Coalition. We have reviewed the Energy Star Criteria Version 3 and we think there is a possibility of confusion by readers of Section 4.2 We believe you mean a black tile placed behind the sample for things that are not completely opaque- from roll roofing to coatings on leneta cards. We don't think you mean for metal coil coatings themselves to be tested over a black background. We believe that is only relevant to field applied coatings as a 'worst case' scenario for TSR performance. Therefore, we think 4.2 should read something like:

4.2 Initial Solar Reflectance: A 3" x3" flat sample of each product shall be submitted for testing. For field applied coatings, the sample shall be prepared according to manufacturer recommendation for thickness used in the field over a black substrate.

We think that gets to the intent and clears up any kind of clash between 4.1.1 and 4.2.

Thank you,
Bob