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—such as 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