

To Whom It May Concern,

One of our roof products is currently ENERGY STAR Qualified and in order to maintain that qualification, we must retest after three years on a weathering farm. I do not disagree with the requalification. I do disagree with the timeline given that, one, this requirement is still in draft format. Second, within that draft, there may be the addition of multiple location testing. And third, even if this specification was finalized today, there is little time left to arrange for testing and still meet the March 2015 deadline. Therefore, I propose that when the V3.0 Specification is finalized, it has an implementation date 3 years and 6 months from that date. That would allow manufactures, laboratories, and certification agencies enough time to recertify products.

Thank you for your time and consideration.

Sincerely,

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