

## Public Comments – ENERGY STAR Windows, Doors and Skylights v6.0 Framework Document

Submitted by Bob Powers, Elixir Industries

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NFRC,

As a window and door manufacturer, we have been struggling to justify the costs associated with ENERGY STAR while trying to maintain competitive pricing to our customer and end consumers. As for air leakage, we are already required to test for air leakage in our AAMA 1701 and AAMA 1702 programs. In addition to the ASTM E330, AAMA 1701, AAMA 1702, NFRC 100/200, Insulated Glass Requirement and various local requirements, the related costs of maintaining these programs are constantly rising during these hard economic times. Additionally, with all the required standards, they are now starting to contradict each other (i.e.: ADA threshold requirement vs AAMA water leakage requirement). Adding air leakage to the ENERGY STAR program adds a duplication and additional documentation that is already covered by one of more of the established testing programs we are already required to meet.

While we are currently supporting the ENERGY STAR program, further changes to the requirements come at a difficult time for U.S. manufacturers as we are continually reducing our workforce numbers to remain profitable. It should be noted, we have not recouped our costs from the last round of retesting we had to perform due to the tightening of the ENERGY STAR requirements. Foreign competition increases our difficulty of recovering the expanding costs of the ENERGY STAR and other programs.

Sincerely,  
Bob Powers

National Accounts and Testing Coordinator / Interim Division Manager - Crossville  
TN Elixir Industries