

Response to Energy Star v6.0 Framework Document

Quanex Building Products would like to offer the following comments regarding the ENERGY STAR® for Windows, Doors, and Skylights Version 6.0 Product Specification Framework Document October 2011

Program Elements Considered for Adoption

- Structural Requirements - We support the recommendation to not include alternative requirements at this time based on limited participation in NAFS by Energy Star Partners.
- Products Installed at High-Altitude - We support the recommendation to not offer special allowances for high altitude products and we agree that there are alternative paths to meet this requirement already being practiced in the industry.
- Impact-Resistant Products – We support the recommendation to not create a separate set of criteria for impact resistant products due to the small percentage of windows produced meeting this local market need. We would add to the rationale that most impact resistant product sold today is in the southern zone where u-value criteria is not as severe.
- Daylighting - No comment
- Lifecycle Analysis – We support further study of LCA and feel that industry participation is an essential part of this work.

Program Elements Remaining Unchanged

- ENERGY STAR Climate Zones – No comment
- Tubular Daylighting Devices (TDDs) – No comment

New Additions to Program Requirements

- Air Leakage - We support the addition of air leakage criteria however the target set in the framework document seems inconsistent with Energy Star's position as industry leading performance. We also support the idea of allowing an optional labeling for Air Leakage in the form of the AAMA Gold label or the WDMA Hallmark label. Many of the window and door systems designed by Quanex Building Products and sold to window and door manufacturers are pre-tested to meet air leakage criteria. QBP offers this service for both window and door system customers.
- Installation Instructions - We support the use of industry developed instructions such as AAMA

Proposed Revisions to Product Criteria

- Zone Criteria Changes for Windows - We support improvements that advance industry position toward more energy efficient products. There are systems in place in the market to support this based on the High Performance Volume Purchase Program from DOE.

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Is any consideration being given to the use of Surface #4 low-e hard coats in single cavity IG units? In the revised High Performance Window Volume Purchase Program this criteria was added to reduce the risk of condensation. Is Energy Star concerned about this issue?

- Equivalent Energy Performance – No comment
- Doors Criteria Changes – No comment
- Skylights Criteria Changes – No comment