



RCMA Comments on Proposed Changes to Energy Star Roof Products Draft 1 Version 3.0 and Draft Version 2.3

February 15, 2012

Mr. Steve Ryan
Energy Star Roof Products Program Manager
US EPA, Energy Star Program
Office of Air and Radiation
Washington, DC 20460
Via electronic delivery to: roofs@energystar.gov

Subject: RCMA Comments on Proposed Changes to Energy Star Roof Products Draft 1 Version 3.0 and Draft Version 2.3

Dear Mr. Ryan,

The Roof Coatings Manufacturers Association (RCMA) appreciates the opportunity to submit the following comments on the proposed changes to the Energy Star Roof Products Specification Draft 1 Version 3.0 and the Energy Star Roof Products Specification Draft Version 2.3. RCMA is the national trade association representing the manufacturers of bituminous and non-bituminous roof coatings and the suppliers to the roof coatings industry.

Energy Star Roof Products Specification Draft 1 Version 3.0

RCMA remains supportive of producers and resellers working with a certified body to maintain Energy Star accreditation for their products. Regarding the time frame for compliance if the proposed changes are accepted, the time frame should be a minimum of six months. Furthermore, the deadline date of March 1, 2015 should be adjusted to go into effect at minimum three years and six months after the enactment of the proposed changes. This allows any producer to complete paperwork, submit samples, and allow the certified body time to apply. In order to reach more potential stakeholders and assist in maintaining all current stakeholder participation the change in the deadline date is very reasonable and necessary.

RCMA is also supportive of establishing "regional certifications" to allow the manufacturers that wish to have their products approved in only one or a few climatic zones and labeled accordingly. This option allows manufacturers who wish to have their products approved in all regions to make the investment without forcing the other manufacturers to test in areas they have no intent to sell.

RCMA does not agree with the statement in paragraph six that “EPA reserves the right to change the specification.” If a producer is testing a product in compliance with EPA standards, that producer should be entitled to assurances that if its product meets those standards it will carry the designation of an Energy Star qualified product for a clearly defined amount of time to justify the investment.

Energy Star Roof Products Specification Draft Version 2.3

RCMA believes that using the specified roof surface area fails to take into consideration shade and thus can skew the results. This may cause the consuming public to be left with a false expectation that there will not be a consistent solar reflectance over the entire roof surface. Those reflectance rates, along with emissivity ratings, are the core to the calculated energy savings on the United States Department of Energy roof calculator.

Once again, we appreciate the opportunity to comment on the proposed changes to the Energy Star Roof Products Specification Draft 1 Version 3.0 and the Energy Star Roof Products Specification Draft Version 2.3. Please do not hesitate to contact me if you have comments or questions on any of the above.

Sincerely,

A handwritten signature in cursive script that reads "John Ferraro".

John Ferraro
General Manager
Roof Coatings Manufacturers Association