

April 30, 2010

Kathleen Vokes
U.S. Environmental protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: New proposed requirements for roofing products

Dear Ms. Vokes,

The success and importance of the Energy Star program to the prepainted metal roofing market is instantly recognizable when you look through any industry publication, visit manufacturers' websites or read metal roofing brochures. Consumers rely on the program in order to source roofing products that reduce their energy needs and are made the same or better than standard products.

In reviewing your proposed changes to the Energy Star Roof Program, I fully agree with the intent but am concerned about the implementation process. It seems that we may be rushing to conclusions that may have adverse affects on the program. Many have been quick to suggest third party verification and testing while casually dismissing the extra cost and delay to market. Many also assume that third party testing equates to more accurate reporting, yet this is not necessarily true.

I am not certain that we have a problem with inaccurate values being submitted in the Roof Program. According to your March 19, 2009 press release, "The Energy Star program already has a comprehensive system in place to ensure consumer confidence that products carrying the Energy Star label actually save energy and save them money." It goes on to state "...in the past few years the number of violations has been quite small, especially given that more than 40,000 individual products carry the Energy Star label."

I agree that Energy Star should be only list products tested by qualified labs. I recommend requiring labs to have an ISO 17025 accreditation performed by A2LA or the International Accreditation Service (IAS).

If these requirements are in place, there should be no distinction made between an OEM lab and a third party lab. I believe that the vast majority of companies strive to be reliable, knowledgeable and trustworthy. The risk of tarnishing a company's reputation with negative publicity regarding the Energy Star program should be enough deterrent to keep companies honest. Perhaps we should back up a step and review what is already in place.

I suggest auditing current partners to determine who, if anyone, is violating the procedures. Violations of Energy Star procedures not only hurt the program but hurt all of its partners and the American consumer. These companies should be put on a corrective course of action. Companies that are complying with the rules should not be forced to pay for retesting.

Please consider that it is not just the testing fee cost that manufacturers will incur. There is also cost in making panels, preparing paperwork, and shipping products from site to site. These costs that have already been incurred while adhering to the present requirements.

We seem to be rushing to get a new process in place that would cost manufacturers and their customers a considerable amount of time and money to verify existing products as well as create unneeded hurdles to list new products. For example, we currently offer more than 30 shades of red. If the Energy Star program institutes rules that results in duplicate or unmanageable costs, we may need to significantly cut the number of products we list. Other companies may be thinking the same way. This new change, if not cost effective, could reduce the amount of products being billed as Energy Star.

We have seen our Energy Star offering grow substantially over the years. We have always encouraged our customers to become Energy Star partners because it was a trustworthy, low cost program. The new changes could hamper the growth of this market segment and reduce the number of choices available to consumers.

I do believe that we can ensure that requirements are being met in a way that does not harm the program or the roofing market. Thank you for considering my comments.

Sincerely,

Mary Ann Johnson
Marketing Manger
Coil and Extrusion Coatings
Valspar