



July 23, 2012

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**Subject: Single Climate Zone Weathering Test – Key Elements of Version 3.0 Draft Proposal**

The Valspar Corporation appreciates the opportunity to submit comments on Draft 2 Version 3.0 Roof Products Specification. Valspar would like to see the requirements for weathering remain a single climate zone with the EPA specifying “allowed climate zones”. The three (3) geographic locations typically recognized for weathering are South Florida, Arizona, and Midwestern locations. Exposure in either South Florida or Arizona supplies a significant amount of solar radiant energy and daily high temperatures with a substantial amount of moisture in South Florida. We feel these conditions are prudent in weathering solar reflective roof coatings and would like to see both Florida and Arizona included in the “allowed climate zones”. As different partners have different requirements we do recognize the probability that other locations should be included along with Florida and Arizona as EPA Allowed Climate Zones. As in past specifications we feel that continuing the requirement of the exposure site testing samples in accordance to ASTM G 7 with accreditation to ISO 17025:2005 General Requirements for the Competence of Testing and Calibration Laboratories is very important.

Thank you for your consideration,

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