

March 25, 2009

Richard Karney
Program Manager
ENERGY STAR Programs
Department of Energy
Washington, DC

Dear Mr. Karney:

This letter is in response to the ENERGY STAR draft criteria for windows, doors and skylights dated March 11, 2009. We thank the Department for adjusting the August criteria to help consumers, and for your willingness to consider additional changes in the final criteria to improve the ENERGY STAR program.

The new tax credits included in the recent stimulus legislation have now changed the landscape in which ENERGY STAR criteria are being set and seem to have influenced this latest round of changes. ENERGY STAR should not allow its program to be used to promote only niche products, or be pushed aside in order to get legislation passed in a hurry. ENERGY STAR must set reasonable criteria that recognize the technology and durability limits of products, and affordability issues for all consumers. The Efficient Windows Collaborative web search points out that a house full of exotic windows @ .18 U only saves \$ 5.00 per month in home heating costs over a current ENERGY STAR .35 U window. The same comparison of a .3 U window vs. a .35 U window saves \$1.90 per month. ENERGY STAR must be the voice that informs the consumer of the best choice and not the voice that promotes exotic windows at any price.

JELD-WEN values the role of the ENERGY STAR program as a consumer education program and we want even more consumers to rely on ENERGY STAR® when making product selections. For maximum impact, the ENERGY STAR® program must keep consumer payback a central theme – especially during economically challenging times. An attainable payback period is absolutely necessary if the ENERGY STAR® program is to maintain the credibility it has worked so diligently to earn, while encouraging as many consumers as possible to replace millions of outdated window and door units within our aging housing stock.

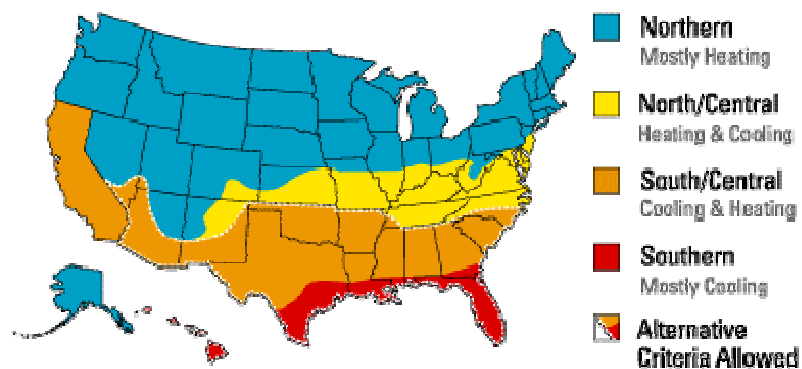
JELD-WEN is constantly striving to provide increased energy efficient products to the mass market at a reasonable and affordable price point. Our customers choose to balance energy ratings, style, structural performance and affordability to fit their needs. Thus, we will continue to fight for solid paybacks for our customers, and for consumers in general. With this in mind, we offer the following recommended changes:

1. The tradeoffs in the Northern zone have been proposed with SHGC values much higher than what was in your August proposal. This change is unjustified and

should be revised back to the original scientifically based criteria. The .30U-NR SHGC should match up with tradeoffs of .31U- .20SHGC and .32U- .25 SHGC. The other zones should also be adjusted to save the maximum TBTU nationwide. The window criteria from Table 3 shown in the revised chart below should be adopted:

	U-Factor	SHGC
Northern	0.30 0.31 0.32	NR >=0.20 >=0.25
North-Central	<= 0.32	<=0.35
South-Central	<= 0.35	<= 0.30
Southern	<= 0.55	<=0.30

- The Zone map in the March 11 proposal does not follow the recommendation of JELD-WEN and all the major industry associations. While we understand the complexity of adopting a simpler map, it remains the best move forward. We can see the benefit of delaying the map simplification to Phase 2 to allow further scientific evaluation and negotiations with NRCANADA, but the proposed March map needs to be changed. Although the map still employs four zones, it also adds complexity by requiring all four zones in Arizona, and creating two variable zone lines in California. Since the current map is in place in tens of thousands of locations, and has been recognized on millions of products, it is in the best interest of the consumers to keep it in place. Therefore, we recommend that you change the criteria to keep the current map in use until Phase 2 implementation. We also recommend that the Alternative Criteria Allowed zone on the current map be eliminated as there is no provision for this in the windows criteria of this proposal.



- The basis for over 90% of the ENERGY STAR qualifying units is exotic gas (e.g. argon) filled insulating glass components. However, these components cannot be

used in high altitude environments due to pressure differential and stress. The ENERGY STAR program must include a way to allow mountain states to offer qualifying units. The program must include a .03 U-factor add on for units installed above 4000' elevation that use a capillary tube. Additional requirements would be to print - "This unit is intended for high altitude installations above 4000' only and uses a glass ventilation device" - on the ENERGY STAR label.

4. The proposed door criteria retaining the single climate zone is encouraging. We agree that this step will simplify the system and benefit consumers' understanding of the complex door rating matrix. We note that the Department did not include all door operator types in this category, but the criteria should address this recommendation. Many door panels can be made into different operator types and the confusion caused by identifying when a door should be rated as a window is significant. ENERGY STAR does not require Casement windows and Double Hung windows to use different criteria, why should door operator type require different criteria? Please assist our dealers and consumers by simplifying the criteria by keeping windows in the window grouping and all doors in the door grouping. The following criteria from Table 4 should apply to all doors; i.e. swing, slide, patio, and entry:

Opaque	<= 0.21	NR
<= 1/2 lite	<= 0.27	<= 0.30
> 1/2 lite	<= 0.32	<= 0.30

5. Tubular Daylighting Devices (TDD) have been left out of the proposal despite the fact that they have NFRC ratings. These devices are essential to offset energy use for lighting and were recently featured in a technology spotlight by President Obama. The energy ratings are not as accurate as windows or doors due to inherent design differences, but the accuracy is sufficient to allow comparison rating and ENERGY STAR qualifications. The program should add TDD products to the Skylight criteria qualifications.
6. The normal variation of window designs that are chosen for a complete house package can cause one product to disqualify the entire house. The ENERGY STAR program should combine grids and laminated glasses into one rating to allow the approval of normal house fenestration packages.
7. The labeling issue of requiring the map on every product has outlived its use. Requiring the map in marketing materials and point of purchase displays makes sense, but not for every product. Make the map inclusion on product labels an option in Phase 1.
8. In order to allow for orderly transition of this phase and future phases, and to avoid the costly and nearly impossible task of relabeling products already shipped or stocked in the supply chain, the ENERGY STAR program should be changed to

base everything on the date of manufacture. To further support this concept, the ENERGY STAR label should add text that indicates which criteria is being used. For example, this new label should say "Meets ENERGY STAR revision D" . Base labeling criteria on the date of manufacture and add text to the ENERGY STAR label to identify which criteria the product meets. Do not require relabeling of products in stock at distribution or retail locations.

9. Update the implementation schedule to allow the earliest 2010 ENERGY STAR label to be used 1/1/2010, the last day of 2005 ENERGY STAR label use be 2/15/2010 and require that all store displays be updated by 4/1/2010.
10. Phase 2 work should commence immediately. We have the following list of issues that must be included in the 2015 criteria and look forward to working with the Department toward that end:
 - a. Embodied energy content - we know that the manufacture of triple pane windows can add dramatically to carbon and energy content beyond the windows' energy saving benefit;
 - b. Payback analysis - full LCA must be incorporated as suggested by Senate leaders;
 - c. Remodeling and New Construction segmentation - different markets need different products; and
 - d. Scaled version of ENERGY STAR program - to allow recognition of super products without requiring all products to dramatically increase cost.

The estimated one billion existing outdated and energy wasting windows must be addressed by the program. We must find the right balance of affordability and energy performance to allow replacement of these products.

Again, we want to convey our appreciation for the process the Department has created to promote industry, consultant and Department of Energy cooperation. The only way the consumer wins is if we all work together to create the best system.

Sincerely,

Ray Garries,
JELD-WEN, inc.