



American
Architectural
Manufacturers
Association

March 25, 2009

Mr. Richard Karney
Energy Star Products Manager
U.S. Department of Energy

Dear Rich:

AAMA, the American Architectural Manufacturers Association, offers this letter in response to the new proposed Energy Star criteria released on March 11th. AAMA represents over 350 companies in the fenestration industry who are stakeholders in this issue. We compliment the US Department of Energy on the ongoing effort to include the industry in the development of the criteria and in particular to revisions made to the previous proposed criteria as a result of stakeholder feedback. The members of AAMA understand the fine balance between the promotion of superior energy performance, technology incentives and providing a logical purchase option for the consumer.

AAMA polled its members and solicited their input. We asked them to respond directly to DOE as well as provide us with comments about what they liked and disliked about the criteria. These are paraphrased and combined when possible:

- 1) Utilize the Ducker Research Report to gather the volume data – it is credible, the channels are in place, addresses confidentiality concerns, and also makes the volume information available to the industry.
- 2) Delay the implementation date - due to severe economic conditions and confusion with the stimulus tax credit, there is consensus that the implementation should be delayed until the tax credit is out of play.
- 3) Manufacturers of primarily commercial, storefront, and curtain wall fenestration prefer multiple disclaimers associated with the criteria to specifically explain that it is residential criteria, and that it does not apply to non-residential applications. These same manufacturers anxiously await a similar program for Energy Star for commercial applications!
- 4) To facilitate understanding in the marketplace, consider the following:
 - a. 3 Climate Zones instead of 4
 - b. Align SHGC (windows) for Climate Zone 1 with tax credit, doors, and skylights at a value of .3
 - c. Consider all doors in same category, regardless of their operation.
- 5) Allow a U-factor stretch of .03 for high altitude applications, (where a breather tube may negate the thermal performance improvements provided by inert gas fill).
- 6) Northern Zone Criteria of .30/NR, .31/>.20, or .32/>.25 was preferred.



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AAMA members recognize that the Energy Star for Windows program is a very effective vehicle for easy identification and understanding of energy efficient products by the consumer. Our members are unanimous in their support of the more interactive approach which encourages input from all industry stakeholders, clarifies DOE's goals, and clearly fosters a cooperative effort. Although the diversity of our industry tends to prevent universal acceptance from participants, we believe that the continued active participation between AAMA and DOE will yield the best program possible. We look forward to working with you in the near future on phase II and on the Energy Star Program for Commercial Fenestration.

Sincerely,

Richard G. Walker
AAMA President and CEO

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Visit AAMA During These Upcoming Events

AIA National Convention and Design Expo: Apr. 30- May 2, San Francisco, CA (Booth 2616)

AAMA National Summer Conference: May 31-June 3, Minneapolis, MN