

**Asphalt Roofing Manufacturers Association**

750 National Press Building  
529 14th Street, NW  
Washington, DC 20045

Tel: 202.591.2450

Fax: 202.591.2445

July 11, 2013

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](mailto:Roofs@energystar.gov)

Subject: **ENERGY STAR Program Requirements, Draft 3 Version 3.0 Roof Products Specification and Draft 3 Test Method: Maintenance of Solar Reflectance**

Dear Mr. Ryan,

I am writing on behalf of the Asphalt Roofing Manufacturers Association (ARMA) in response to your request for comments by July 12, 2013. ARMA is the trade association representing North American bitumen roofing manufacturing companies and their raw material suppliers. We offer the following for your consideration:

1. Draft 3 Test Method: Maintenance of Solar Reflectance

The current draft of the Test Method states that "at least three (3) measurements of solar reflectance from different areas on each sample" should be completed. ARMA does not believe this amount of samples is adequate for the radiant measurement. As a result, we would like the number of measurements to be increased in order to ensure more accurate results.

Thank you for your consideration of our comments. Please feel free to contact me if you have any questions.

Sincerely,

Reed B. Hitchcock  
ARMA Executive Vice President