

Asphalt Roofing Manufacturers Association	
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February 14, 2012

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Mr. Steve Ryan
Energy Star Roof Products Program Manager
U.S. EPA, Energy Star Program
Office of Air and Radiation
Washington, D.C. 20460
Via electronic delivery to: Roofs@energystar.gov

Re: - **ENERGY STAR Program Requirements,
Product Specification for Roof Products Draft 1 Version 3.0**

Dear Mr. Ryan:

I am writing on behalf of the Asphalt Roofing Manufacturers Association (ARMA) and ARMA's Cool Roof Steering Group in response to your request for comments by February 15, 2012.

As you will recall, a specific topic of discussion during our July, 2010 meeting with you and members of our steering team was the burden of the 3-year aging requirement for roof products. No other product in the ENERGY STAR program must meet a 3-year requirement. This requirement inhibits product innovation, limits product development, and places a significant cost burden on roof product manufacturers. At the July, 2010 meeting, ARMA requested that ENERGY STAR revisit this requirement and consider promulgation of an alternative test method to predict the aged radiative properties of roof products without the onerous burden of waiting 3 years.

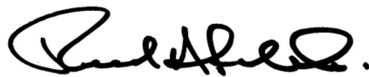
During our meeting, we were told that this was the first discussion that you had indicating that the roofing industry thought the 3-year requirement was a concern and you assured us that you would investigate and look at the work that is being done on alternatives to the 3-year aging. There was no discussion about requiring test farms or any discussion about existing test methods being flawed. We are disheartened and somewhat amazed to have received no communication from you or your team during the past 18 months prior to the above referenced document on January 18th, 2012.

The proposed changes in Draft 1, Version 3.0 specification would not take effect until March, 2015. Although this proposed effective date may seem generous, it provides insufficient time for manufacturers to re-qualify currently listed products that obtained their listing via a method that did not utilize "test farms." In fact, manufacturers would need to submit samples to test farms immediately to meet this extremely aggressive timeline. First, this is an unrealistic demand and will restrict products in the ENERGY STAR program in 2015 by the very nature of its timing and the inability of manufacturers to get product into the testing farm pipeline in the next 30 days. Secondly, Version 3.0 completely ignores the large body of work that has produced an accelerated aging protocol which provides a greater than 95% correlation to aged results. To promulgate a specification for implementation in 3 years while ignoring the science and work that has been undertaken is not the path that ARMA recommends ENERGY STAR follow.

We strongly urge you to postpone publishing Version 3.0 or at the very least, set an implementation date of October, 2016. This would allow time for manufacturers to undertake the aged solar reflectance testing being mandated in the standard. We also, again urge inclusion of an accelerated aging protocol and recommend that you investigate the method developed at Lawrence Berkley Laboratory with the cooperation of Oak Ridge National Laboratory and the Department of Energy.

We would welcome an opportunity to hold an open discussion about these recommendations with industry stakeholders, and at a minimum would appreciate the courtesy of a response to the above. Thank you for your consideration and we anxiously await your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Reed B. Hitchcock". The signature is fluid and cursive, with a large initial "R" and a distinct "H".

Reed B. Hitchcock
ARMA Executive Vice President