

My comments are based on the change to the Variegated Roof Products in the Version 2.3 Draft Specification as highlighted below:

Version 2.3 Draft Specification

Variegated Roof Products: Variegated roof products are generally not eligible for qualification as a Color Family Additional Element consistent with the Cool Roof Rating Council's product rating program. Variegated roof products may only qualify using Maintenance of Solar Reflectance testing.

If a roof product is printed, using between two and four coats of coil-applied paint and all of the coatings are Color Family Representative Elements or have at least been aged for 3 years and have maintained their initial solar reflectance, it would be logical for them to be able to be Color Family Additional Elements rather than to be automatically have to go through standard testing. This would be assuming they have the same binder/resin technology. Please reconsider this statement and allow for variegated roof products that have matching binder/resin technologies and consist of coatings that are already tested to be listed as a Color Family Additional Element.

Thank you for your consideration,

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