

In response to the **ENERGY STAR Draft 2 Version 3.0 Roof Products Specification**, AkzoNobel offers the following comments:

- *Single Climate Zone Weathering Testing:* We support the current single climate zone program that consists of using test farms in Florida. This environment has been proven to be the most severe on a coating system and has been considered the benchmark for many industries. Allowing the addition of other climate zones where degradation of the painted may be less than that of South Florida runs the risk of allowing less than top quality products to be certified into the program. The use of multiple sites will bring no benefit to the program to offset the increased cost to the Stakeholders. This program began as a no cost program and has already increased to a substantial cost resulting in driving away Stakeholders. Adding the requirement of multiple sites will drive away more Stakeholders.

Thank you for the opportunity to comment.

Sincerely,

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