

FENESTRATION MANUFACTURERS ASSOCIATION  
1625 Summit Lake Drive, Suite 300  
Tallahassee, FL 32317

November 14, 2008

Mr. Rich Karney, P.E.  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
1000 Independence Ave. SW  
Washington DC 20585

Dear Mr. Karney:

On behalf of the membership of the Fenestration Manufacturers Association (FMA) thank you for the opportunity to comment on the proposed revisions to the Energy Star program for Windows, Doors and Skylights. The FMA, a regional trade association doing business in the southeastern U.S. and Gulf Coast states, brings a different perspective than national trade associations due to our expertise working in extreme environments characterized by high wind, high rainfall and abundant sunshine conditions.

FMA would like to voice support for the Window and Door Manufacturers Association's (WDMA) position regarding its proposed changes to the Energy Star in its entirety except for the U-factor and SHGC values presented for the Southern Zone. WDMA has proposed a 0.50 U-factor and a 0.25 SHGC for the Southern Zone. FMA opposes these values and asks that the DoE adopt the Aluminum Extruders Council's (AEC) proposal of a 0.60 U-factor and a 0.27 SHGC. FMA also strongly supports the AEC's proposal for exceptions for impact resistant products, separating sliding glass patio doors from side-hinged doors, and that the Energy Star program is explicitly for residential low-rise use only.

FMA would be more than happy to assist in further discussions of this issue at the appropriate time.

Respectfully submitted:

**Richard H. Wilhelm**

Richard H. Wilhelm  
Executive Director  
Fenestration Manufacturers Association