

To: US EPA c/o windows@energystar.gov
From: Jon Hill, President
Keystone Certifications, Inc.
Date: October 31st, 2011
Re: **ENERGY STAR Wdws Doors & Skylights V6 Framework Stakeholder Comments**

Keystone Certifications supports the EPA's efforts to reduce US energy consumption by driving market demand for ever-improving energy efficiency of fenestration products, and appreciates the opportunity to provide feedback to the spec development process.

Keystone currently provides NFRC Inspection Agency (IA) services for 403 NFRC program participant manufacturers, and 45% (195 of 438) of current ENERGY STAR listed fenestration manufacturer Partners were qualified by Keystone NFRC IA services. We are also an ANSI ISO Guide 65 accredited and EPA – recognized Certification Body for several other ENERGY STAR product categories. My comments focus on the following Sections of the fenestration Product Specification Framework Document:

Section II a. Structural Requirements

I believe our position as a certification body requires we refrain from offering our opinion as to the value of adding a structural certification requirement. My comments on this section are intended as clarification to the EPA's understanding of the number and capacity of agencies offering structural performance certification to the NAFS standard.

There are a total of FOUR (4) agencies, qualified by ANSI Guide 65 accreditation, offering NAFS certification services, the Framework Document only refers to two of these agencies – AAMA & WDMA. The “less than a quarter of E-S partnership base currently participates in NAFS certification...” statistic quoted in this section is significantly inaccurate if it does not include those fenestration manufacturing Partners who employ Keystone Certifications or the National Accreditation & Management Institute (NAMI) for their NAFS certifications.

56 of the 195 ENERGY STAR Fenestration Partners qualified by Keystone also employ Keystone for NAFS certification. This represents an additional 13% of the 438 total E-S Partners who are currently NAFS certified. (I cannot provide this statistical information for NAMI.)

I also ask the EPA to consider what impact two additional accredited agencies represents in the determination of “inundation of ~~AAMA and WDMA~~ accredited certification agency resources”.

Section II d. Daylighting

Many in our industry are concerned that further tightening of SHGC requirements will result in fenestration products employing darker and darker tints, and as such come will at the expense of daylighting (represented by NFRC VT). The energy savings resulting from lower SHGC may be offset by the increased use of electrical lighting during daylight hours. While the proposed V6 SHGC values seem reasonable, I urge the EPA to consider how VT values will diminish and seek to understand the impact of this on the use of electrical lighting.