

## Public Comments – ENERGY STAR Windows, Doors and Skylights v6.0 Framework Document

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- The EPA wants to encourage certification to NFRC 400, which is NFRC's air leakage test standard. It references ASTM E 283, which is the same standard referenced in AAMA/WDMA/CSA 101/I.S.2/A440... However, it states the minimum test specimen size shall be the same size as used for thermal testing. That size does not generally meet the "gateway" size required for A/W/S testing. My point – as long as the same basic test standard (ASTM E 283) is referenced/used in both, the test results conducted under normal A/W/S testing should be allowed (same as Canada) to avoid additional costs.
- The best way to state the air leakage results should be somewhat generic as it's not an exact science. The same unit could be tested five times w/five different results.
- Results should be on the NFRC label, to keep it fluent & consistent. AAMA gold labels & WDMA labels don't usually go into that great of detail, and will require those two organizations to redesign and/or add a section to their labels. There's already an area on the NFRC label to accommodate air leakage.
- Documentation in the CPD (Certified Products Directory) could be handled by referencing a test report #, or AAMA/WDMA license/Hallmark number in the CAR (Certification Authorization Report) header. I would hesitate to include it w/in the body of the CAR.
- If a field was added to the NFRC test sample submittal form to include the air leakage number, test report number and/or certification/license number, that could be included by the test labs during the uploads to the IAs (Inspection Agencies). This form is required regardless, so it wouldn't add anytime or paperwork to the existing thermal certification program