

On behalf of Lanco Manufacturing Corp., below are our comments with regards to draft 1 version 3.0:

1) Effective Date: Current draft proposes an effective date of March 1, 2015 for all products to be certified under version 3.0. Considering the lead time for the preparation and curing of samples and initial tests by an independent lab (approximately 6 weeks), the lead time to expose by the independent weathering farm (as of last week Atlas was accepting exposures for May 1st 2012, which is approximately 12 weeks), and the lead time for the independent lab to receive and test the panels after exposure and the certifying body to review final results (6 weeks), we suggest an effective date of October 1st to allow for continuation of qualification for those products needing test on approved weathering farms.

2) Section 4.3, Changes to Product Formulation- We suggest clarification of the second sentence in the section. The first sentence states that changes to fundamental elements of product formulation will require retesting of initial and maintenance of solar reflectance, with which we concur. However, the second sentence requires evidence that formulation has not been changed since solar reflectance was tested, implying that formulas cannot be changed after testing. That seems to contradict the first sentence, as the requirement seems to be to retest for any formulation change. We suggest that for changes to non- fundamental elements of product formulation only initial solar reflectance be retested.

Thanks,

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