



Marvin Windows and Doors
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November 13, 2008

Richard H. Karney, P.E.
ENERGY STAR® Program Manager
Department of Energy
Washington, DC 20585

RE: Proposed Revisions to *ENERGY STAR*® Program Requirements

Dear Mr. Karney,

Thanks for opportunity to comment and give input to the next Energy Star Program requirements. Marvin Windows and Doors has participated in and supported the original Energy Star program for windows and doors since its inception. It is our intention to continue that commitment.

Marvin Windows and Doors as a member of the Window and Door Manufacturers Association (WDMA) just participated in a long and difficult review of the program requirements and its potential impact on the consumer public and the industry. So first I want to draw your attention to that report and confirm that Marvin does support the points identified and the positions communicated for Phase 1.

I do want to take this opportunity to bring special attention to several points.

- The existing window stock/replacement market, consisting mainly of clear inefficient glazed products, while always very important is doubly so today. In view of today's market landscape ignoring that segment of the industry will greatly limit the penetration of Energy Star products into the housing inventory. In view of this fact Marvin Windows and Doors urges the Department to use its marketing strength and other incentives to promote this market segment.
- Simplicity of program rules, zones, and documentation requirements provide for more effective marketing schemes and more consumers understanding the process. This understanding will translate into increased program usage and energy savings.
- Tradeoffs in applicable zones. Marvin supports the WDMA position that tradeoff's based on today's data is not supportable. If the department feels compelled to add tradeoffs to this or future programs we urge them to partner with the Industry in establishing justifiable links between U-Factor and SHGC performance. These assumptions shall include a wider set of criteria based on sound science that fully addresses all performance attributes including comfort.
- Marvin supports the reference product line, single performance point concept. The proposed ratings divide product lines based on slight changes in performance **not due** to changes in glass packages but to aesthetic choices such as grilles and divider bars. Allowing this "reference point product" to represent the entire line will greatly simplify marketing claims. Note that we use a reference or model size for program compliance today, recognizing the fact that not all sizes are equal in either U-Factor or SHGC. We also recognize the fact that in most homes performance averages due to the size matrix are accurate and the same would be true here.

- Program rules and implementation. It is more important that the Phase 2 ratings be based on sound science than to get them out early and rush to failure. Give the industry the rules with sufficient time to respond. Phase 2 will require more than the 270 days proposed for phase 1. So rules sometime in 2010 and implementation in 2015.
- Marvin recommends that a full review of impact products be conducted that compares “ES Zones” as applicable to “Impact Zones” before Phase 2 ratings are established. I have grave concerns that the market could be driven to design tri-pane impact products. This will drive up the embodied energy and greatly lengthen any payback period in addition to compromising several durability attributes of the products.
- Labeling simplification should be promoted. With all of the operator type product lines, glass options and other performance requirements label space and complexity is critical. Energy Star is just one of several program labels that all have to fit on the window label somewhere. We are running out of real estate.
- I do have additional comments applicable to Phase 2 but will wait to submit them when more information, as requested by WDMA is available.

Yours sincerely,

James Krahn

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Marvin Windows and Doors

Manager of Codes and Regulatory