

NATIONAL ACCREDITATION AND MANAGEMENT INSTITUTE, INC.

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September 8, 2008

Richard H. Karney, P.E.
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20505

Dear Mr. Karney:

First, let us state that we do appreciate all the work and effort that is prevalent within the Energy Star Program for Windows, Doors and Skylights. The documents from the August 13, 2008 meeting represents many hours of work and labor. We have forwarded that information from that meeting to our licensees in order for them to review and comment.

NAMI Staff has reviewed the document and there were concerns raised on our end regarding the sections reflecting Insulating Glass Certification. As a leading certification agency for windows and doors, are comments are not meant as criticism, but rather to further the accuracy of the document.

Our major concerns included:

1. Proof of gas content certification. Currently there is no standard within the window and door industry that would be considered credible. This process should be based on a nationally recognized specification in order to obtain repeatability of findings, whether performed at the manufacturer's location, in the field, or at the test laboratory upon completion of testing. The document initially recommended by NFRC was from an association which muddled some of their quality assurance requirements and their method to determine gas fill. This document would not meet the scrutiny of ANSI or any other agency that approves specifications. Before this is defined in your document, there should be an agreed upon methodology or specification developed.
2. "The testing lab approval process...to ensure the testing laboratory is in full compliance with ASTM E2190 or CGSB 12.8." Testing laboratories are reviewed for compliance to ISO/IEC 17025. It is the laboratory accrediting agency that is responsible to review the laboratory for compliance to 17025 and to determine their technical competency in meeting the standards that they have applied for with that agency. If NFRC requires the certification to comply to ISO/IEC Guide 65, then the

laboratory requirements are defined and no further statement would be needed within the document. Guide 65 is all encompassing!

3. "Certification agencies will perform at least two (2) audits per year of Program participant's IGU fabrication facilities". Under our ANSI Accredited Certification Program for Insulating Glass, manufacturers are only required an annual inspection for insulating glass. Two are only required if they are under HUD UM 82b, however, that program is very outdated and needs to be overhauled.

NFRC only requires one inspection per year for thermal properties. Why would two inspections be pushed upon manufacturers? This increases their costs significantly. Not only will they have the burden of re-testing every two years, they will also have to pay for more inspections, which increases travel and expends more energy. **The irony of using more energy to determine if a manufacturer is making a product that will conserve energy is actually very comical.** The only reason this is being pushed is purely political. The certification agencies that are pushing these policies are not ANSI accredited and are simply trying to maintain or further their economical status. If a certification agency is accredited to ISO 65, **AND** has insulating glass as part of their scope, **AND** NFRC has accepted their accreditation, **then the number of times a manufacturer is inspected each year should be determined by the Certification Bodies' Insulating Glass Program.**

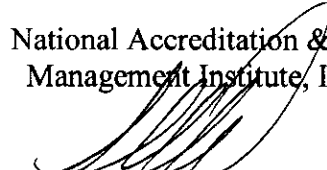
With technology increasing everyday, a second inspection could include a web-based follow-up with the manufacturer as a quality assurance check. **If the language is left as is, it eliminates credible and alternative ways to collect information, increases manufacturers costs and increases energy costs.**

If you would like any further discussion regarding these issues, please do not hesitate to contact us. Please contact us at your convenience.

The most celebrated part of this document is that we have the ability to comment on a government generated document!! That doesn't happen in every country, including some of the countries that we take our certification services too! Take great care!!

Sincerely,

National Accreditation &
Management Institute, Inc.



Sharon R. Durand
President