

# **National Accreditation & Management Institute, Inc.**

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October 18, 2011

Doug Anderson  
ENERGY STAR Program Manager  
Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Anderson:

Thank you for the opportunity to provide the following comments on behalf of National Accreditation & Management Institute, Inc. on the proposed draft of the ENERGY STAR for Windows, Doors, and Skylights Version 6.0 Product Specification Framework Document. Upon review of this document, we became increasingly concerned about the continual references to two organizations that are involved in the certification and labeling for the proposed air leakage and/or structural requirements. Please understand that our only intent here is to enlighten you to information that you may or may not be aware of and to provide for a more informed industry.

In your document, reference is made to two organizations (AAMA and WDMA) which could be construed to outsiders as the only two organizations that are qualified to conduct certification and labeling to the NAFS standards (or structural standard). As you may be aware, the NAFS standards are a compilation of test methodologies that AAMA and WDMA have adopted with the majority of the test methods being ASTM. They have also added material requirements to the standards as well. These entities serve as specification writers in this capacity. However, the information that you are referencing in your document has to do with certification, which is a complete and separate entity. There are other agencies besides AAMA and WDMA that manufacturers employ to evaluate and certify to the standards that you reference in Section II.a. Also, the NAFS standard is only one document. Many companies choose to test to the ASTM test methodologies, particularly the door industry. The NAFS standard for doors is geared toward high velocity wind zones which only encompass a small percentage of the country. Furthermore, consideration has to be given to the restrictiveness of the NAFS standard with regards to the addition of their material requirements, as this inhibits some foreign entities from introducing new or existing products to the U.S. market. Even though EPA has moved away from structural certification, for the time being, all of these topics should be discussed.

We believe that your sole reference to AAMA and WDMA is misleading to ENERGY STAR partners or prospective partners, and promotes an unfair advantage to these organizations by alluding that they are the only organizations capable of conducting certification and labeling to these standards. Section II.a states, "At this time however, less than a quarter of Energy Star's partnership base currently participates in NAFS certification through AAMA or WDMA." There are two other references that can be misconstrued, as well. Section IV.a states, "Allowing the AAMA Gold Label or the WDMA Hallmark label to be used instead of listing air leakage on the NFRC temporary label" and "Having manufacturers relying on AAMA or WDMA labeling work with their Inspection Agencies to ensure test results are uploaded correctly to the CPD." We hope that you will agree that this language is very

disingenuous. NAMI and other entities have certification and labeling programs in place and their certifications and labeling clearly define what standards the manufacturer has been certified to (this includes air leakage). All of the approved NFRC Inspection Agencies have accredited structural certification programs that encompass air leakage. If a certification label from any of these agencies reflect the NAFS standard or the ASTM E283, air leakage has been tested and captured in the certification process.

We are requesting that the certification entity names that you have referenced in your document be stricken and that due diligence is exercised in the preparation of such documents to promote fairness and equity among all parties concerned. By limiting your references to only two named organizations, you may very well be creating a standard that boycotts other organizations and thereby, promoting an unfair trade advantage. We suggest that no named organizations should be equated with the certification process, but simply a statement saying that, "as long as a manufacturer participates within a certification program that is independently accredited to ISO/IEC Guide 65 and has certified and labeled their product to ASTM E283 or one of the NAFS standards" would suffice and capture Air Leakage.

We respectfully request that you include all organizations qualified to provide these services and avoid making references to any specific organizations. Our hope is that you will see the validity in our argument and make the necessary corrections to rectify this situation and to prevent future occurrences of such. If you would like further collaboration regarding this matter, American National Standards Institute (ANSI) or International Accreditation Services (IAS) would be neutral and informative sources to consider. Collaboration with these entities will ensure that Energy Star remains a substantial and neutral influence to the Window, Door and Skylight industry.

Thank you for your consideration.

Sincerely,

National Accreditation &  
Management Institute, Inc.

A handwritten signature in black ink, appearing to read 'T. Wix', with a stylized flourish at the end.

Thomas Wix  
Vice President-Quality Assurance