



Mr. Doug Anderson,
ENERGY STAR Program Manager
U.S. Environmental Protection Agency
Washington . D.C. U.S.A.

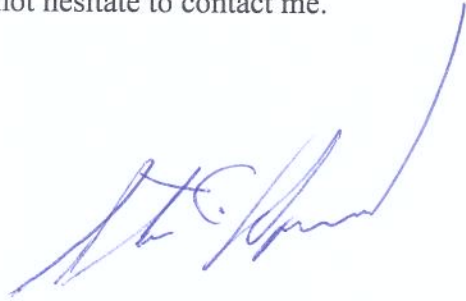
Dear Mr. Anderson:

Natural Resources Canada (NRCan) is a committed ENERGY STAR international partner who promotes and administers the ENERGY STAR symbol in Canada. We support your initiative to increase the stringency of the fenestration products program and would like to take this opportunity to comment on your most recent specification framework document for ENERGY STAR qualified windows, doors and skylights. These comments are based on our technical analysis previously forwarded to you and on our continuing experience with the program.

1. We feel that the new levels proposed for windows and skylights for the Northern and North-Central Zones are reasonable and would like to see the U-factors set to the more stringent range of the U-factors suggested. We also feel that the maximum SHGC for skylights in the Northern Zone is unnecessary and should be dropped. We would also like to see the U-factor / SHGC trade-off retained in the Northern Zone as our models continually show solar gain to be beneficial in a heating dominated climate. We will not comment on the proposed levels for doors as we handle the levels differently in Canada.
2. Adding a structural component to the program, including air leakage minimums, is a good idea and would bring the U.S. program more in line with the Canadian program. In fact, we are seriously considering extending the structural testing requirement and adding an air leakage minimum for entry doors, sidelites and transoms in our next technical specification. We will also likely implement a 1.5 l/s/m² (0.3 cfm/ft²) minimum for these products as anything higher than that exceeds the maximum allowable in the North American Fenestration Standard (NAFS). Requiring third-party certification would be ideal but difficult to implement in today's economic climate so we will likely retain a self-certification alternative.
3. If the EPA decides to move forward with a third-party certified structural or air leakage requirement, we suggest that you consider adding CSA, Intertek and Quality Auditing Institute to your list of acceptable certification agencies for structural performance. These certification agencies are all accredited by the Standards Council of Canada and all test to the NAFS standard so there is no reason why they should not be accepted.

4. NRCan agrees with the EPA's stance on high altitude products and the daylighting criterion. We also support the proposal to post installation instructions on the web and have no comment on the life cycle analysis idea as NRCan normally only looks at end-use energy usage.

Thank-you for the opportunity to provide comments. If you have any questions, please do not hesitate to contact me.



Steve Hopwood,
ENERGY STAR Fenestration Account Manager,
Office of Energy Efficiency,
Natural Resources Canada