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Sent: 10/29/2010 06:27 AM MST
To: Maria Vargas
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Subject: Top Tier Feedback from ODL

Hello Maria.

Thank you for the materials outlining plans for the Top Tier designation. We were originally concerned about the logistics and timing associated with product labels. This is resolved by limiting the Top Tier designation to digital formats and POP signage. There are still lead time considerations for in-store merchandising that need to be coordinated with our retail partners.

My company, ODL, produces "windows for residential entry doors" as well as tubular skylights. Our doorglass plays a key part in the thermal performance of an entry door. Windows are not included in the initial Top Tier program even though consumers recognize the value of high performance windows as an energy saving solution. We understand that this exclusion may have to do with climate zone considerations. When it comes time to include windows in the Top Tier program we propose evaluating entry doors as a separate category. They currently have their own set of ENERGY STAR criteria. In some cases windows and doors get lumped together and they are quite different from a manufacturing perspective.

The current value proposition for Top Tier products states that the purchase of a highly efficient product in **not always about saving money**. This does not appear to align with one of the guiding principles for ENERGY STAR qualification in that the "purchaser will recover their investment within a reasonable period of time." We have concerns that Top Tier may confuse mainstream consumer understanding of the value of current ENERGY STAR products. I don't think the intent is to imply that these products are "2nd Tier," while in fact they may offer the consumer a better payback for their investment. We appreciate the long-term goal of the Top Tier program but it would be ideal if these products are not so technologically advanced, and expensive, that they don't provide consumers with a pay back message.

Thanks for the opportunity to provide feedback.

Angelo M. Marasco
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