

Public Comments – ENERGY STAR Windows, Doors and Skylights v6.0 Framework Document

Submitted by Michael Kolz, Sellmore Industries, Inc.

To Whom It May Concern:

Looking at the proposed Energy Star guidelines I see smaller manufacturers such as us being overburdened by testing expenses and machinery investments.

We barely meet one code and another is being brought in. I feel we are trying to hit a constantly moving target.

Considering only larger manufacturers who can dedicate staff to testing, process control and labeling in the mix is a mistake.

While it is true they have a greater share of the market due to their size and distribution networks, we feel it is important for us to maintain our window manufacturing division to supply our current markets.

Items for Discussion section II.

We do test for air water and structural through AAMA. We are not labeling every window due to the errors that could occur and in the past have labeled windows on a job required basis.

We do not feel any of the proposals in section II need to be revisited.

Item for Discussion section III.

We feel the Energy Star 4 Zones are adequate. The section on TTDs does not apply to us.

Items for Discussion section IV a.

We are testing most models for air, water and structural.

All models tested meet the proposed air leakage performance standard.

Items for Discussion section IV b.

We have basic installation instructions currently available on our web site.

We have some basic replacement measuring instructions and installation instructions.

We also have some basic new construction installation instructions.

The potential downfalls I see are there are so many different installation situations in the replacement end due to existing window conditions that the instructions can be misleading.

Certain practices should be followed for all installations such as securing the window in the opening, sealing the outside to keep out moisture, insulating around the frame to prevent air leaking around the fenestration unit and cleaning the window and area around opening.

Items for Discussion section V Northern & North Central zones U-Value.

We have just completed new simulations on our window products and without a complete redesign of our double hung the northern criteria forces us to move to triple glazed products, improved gas mixtures or move to new interior glass coatings such as EPS from AGC or IS20 from Guardian. There are also what I call 2nd tier priced low-e glass products but again the cost of these products is greater and controlling the cost of stocking multiple glass types and correctly manufacturing multiple configurations is a constant battle.

We are currently manufacturing triple glazed products but it is labor intensive and costly in a volume setting such as ours.

I have previously purchased glass units from an outside source and found it to impede production and delay delivery and we were buying glass from a close local source no longer available to us.

Improved gas mixtures are becoming available but at a machinery cost that our volume does not regain our investment meaning we would have to raise the price of windows considerably.

As far as the new interior surface low-e products goes, these products meet the test requirements but they are unproven over the long haul and we are hesitant to move entirely to this new technology and warranty it without further live trials.

Foam filling of extrusions is another avenue we are investigating but I am not so sure that is environmentally responsible either. Currently we recycle much of the vinyl we don't put in windows but we are trying to figure out if the foam prevents us from recycling this material.

It seems impractical and irresponsible to increase the cost of windows to a level where the most energy needy (older) homes will not be able to buy reasonably priced energy efficient windows meeting the energy star guidelines.

I believe the .30 level is fair and affordable to the general public. I believe any higher limits are cost prohibitive and cater to the large volume window manufacturers.

I further believe the technology behind attaining better energy standards will come down in price as more companies implement these changes and the ratings should be slowly incremented as we go forward.

From our current double hung simulations we meet the new northern criteria with only triple glazed glass options and 1 dual glazed option using the low-e in tandem with the new interior glazed EPS and argon filling.

We meet .30 with 1 lite Low-E 1 lite clear and argon filling and this is our top seller due to pricing considerations. We have built up stock programs in our branches and at several customer sites with this model.

Because we use the same sash extrusions to build a slider we have essentially the same conditions in that window.

Our casement and awning windows are a bit better and hit .26 U-value with 1 low-e 1 clear and argon filling but of course our main volume window in the northeast is the double hung.

Our fixed lite window is in the middle at .29 U-value with 1 low-e 1 clear and argon filling.

The Low-E glass we are simulating has an emissivity of either .034 or .036 depending on supplier.

Items for Discussion section V b.

We assemble doors from components designed by our suppliers and have not certified our door products since we have been concentrating on our window products when time allows.

Items for Discussion section V c.

We do not manufacture skylights.

Thank you for the opportunity to represent the small volume manufacturers and comment on the proposed changes.

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