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From: Russ Chapman [mailto:RChapman@spi-ind.com]  
Sent: Wednesday, August 20, 2008 2:06 PM  
Subject: Criteria Revision

I am wondering about the logic behind the requirements in the Northwest, specifically a .30 u-value, and why this is not applied to the northeast/New England (probably the single glaze capital of the world) as well. My thoughts here are that if your goal is to save energy across the nation why wouldn't you want to have the most stringent requirements in the higher population/greater impact areas? Are the people in Washington, Oregon, Idaho and Montana the "trial market" for the rest of the North? I quite frankly don't see a large difference in our climates, certainly not temperature wise anyhow, but the u-value requirement is a lot different. It just seems to me that if the goal is to save energy, why not have the highest requirements in the area that uses the most resources? Montana is a large state geographically but I'll bet KW for KW that Massachusetts uses substantially more energy a year than Montana. Our climates are similar, why can a .35 window work there but not here? Another point I would make is that the map breaks at Wyoming. I realize there needs to be "general" boundaries that can easily be followed but in case you haven't been to northern Wyoming in the winter, I'll make it easy for you. If you found yourself in Canyon WY in January you would happily relocate to the middle of MT for nicer weather.

I saw some comments stating that the "technology" is in place already for most people to meet the new guidelines. Well, that is not necessarily accurate. Most wood window manufacturers who have u-values below .30 are using not only triple pane glazing but also argon or a comparable gas. Perhaps I am missing something but it seems as though trying to use argon, with a breather tube that will allow for transport to higher altitudes, is not a viable solution to the issue.

Bottom line, this change may not have a drastic impact on MOST of the country but it is going to be nothing short of miraculous for any wood window, at a reasonable price point, to meet Energy Star requirements next year in these four states at high altitudes. Please reconsider these u-value requirements and, if they will not be changed, please consider expanding them into the areas of the country that they will have the most impact overall.

Thank you,  
Russell Chapman  
Sierra Pacific Windows  
Territory Manager  
Bozeman & Big Sky MT  
406-579-5964 Cell  
406-995-2517 Fax Big Sky  
406-587-1547 Fax Bozeman  
800-824-7744 Regional Office