



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

Climate Protection Partnership Division  
U.S. EPA 6202J  
Washington, DC 20460

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Dear ENERGY STAR<sup>®</sup> and Tubular Daylighting Device Stakeholders:

On June 14, 2010, the U.S. Environmental Protection Agency (EPA) officially began the Phase 2 criteria revision for ENERGY STAR qualified windows, doors, and skylights. During the Phase 1 criteria revision, the U.S. Department of Energy (DOE) announced plans to reevaluate program participation for Tubular Daylighting Devices (TDDs) during Phase 2. EPA is now moving forward with these plans.

Unlike other products certified by the National Fenestration Rating Council (NFRC), TDDs have not been subject to NFRC validation testing. To date, TDDs have qualified for the ENERGY STAR on simulation results alone. In 2006, however, the accuracy of these results was called into question, and in 2008 companies began physical thermal performance testing of TDDs using a hotbox apparatus. In March 2009, DOE decided to suspend TDDs from the program pending a sufficient number of test results on which to base criteria. As more companies tested, it appeared the physical test for thermal performance required further refinement. NFRC opted not to require the physical thermal performance test until 2012, and in April 2009 DOE decided to retain TDDs as a qualified product. Qualification still relies on simulation test results and the skylights criteria.

In anticipation of the switch to physical thermal performance testing in 2012, EPA strongly encourages the TDD industry to work with NFRC and the testing labs to resolve any remaining issues with the physical thermal performance test as soon as possible. Though NFRC will not require physical thermal performance testing until 2012, EPA plans to release final window, door, and skylight criteria in May 2012. If those criteria are to include TDDs, EPA must have a sufficient body of results in place well in advance of this date in order to determine appropriate criteria.

The ENERGY STAR guiding principles require that “product energy consumption and performance can be measured and verified with testing.” With increased scrutiny of the ENERGY STAR program and EPA’s focus on enhanced testing and verification, it is more important than ever that this principle is met.

While a daylighting credit is under consideration during this criteria revision, EPA cannot consider applying such a credit to TDDs until the physical testing issues are resolved. The daylighting value of these products cannot be substituted for accurate thermal

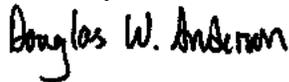
performance test results. Furthermore, even if the daylighting credit takes the form of a separate daylighting program, EPA will not give TDDs a “pass” in ENERGY STAR for Windows, Doors, and Skylights while the new program is developed. To best ensure continued eligibility in ENERGY STAR, the TDD industry must proceed as if a daylighting credit is off the table.

As a reminder, EPA has proposed the following timeline for completing the Phase 2 criteria revision:

| <b>Tentative Timeline</b>          |                              |
|------------------------------------|------------------------------|
| Initial Analysis and Research      | June 2010 – June 2011        |
| Preliminary Criteria Published     | July 2011                    |
| Stakeholder Meeting                | August 2011                  |
| Comment Period                     | August – September 2011      |
| Review Comments, Finalize Criteria | October 2011 – February 2012 |
| Release Final Criteria             | March 2012                   |
| Two-Week Comment Period            | April 2012                   |
| Publish New Program Requirements   | May 2012                     |
| Criteria Take Effect               | March 2013                   |

EPA will remain in contact with TDD stakeholders throughout this process and welcomes any feedback the industry would like to provide. D&R International is available to schedule meetings, interviews, and phone calls to facilitate the resolution of this issue. To do so, please contact Joe Hart of D&R International at [jhart@drintl.com](mailto:jhart@drintl.com) or 301-588-9387. EPA also welcomes written comments; please send your comments to Mr. Hart via e-mail or fax (301-588-0854). Non-disclosure agreements are available upon request.

Sincerely,



Douglas W. Anderson  
ENERGY STAR Program Manager  
U.S. Environmental Protection Agency