

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

Submitted by Dan Bailey, Windowcrafters

Dear Energy Star/EPA,

Please find my comments to your version 6.0 noted below:

We are a small window manufacturer/fabricator and believe in markets more than mandates.

Generally, I find that the recent proposals over the past three years (i.e. IG Certification mandate) have been overreaching and unnecessary, including any NFRC support. So now we need to be IG certified to even be an NFRC product? Is IG certification about “energy savings” or trying to make or prove a better quality product? Additionally now that the Federal window tax credit is over we are back to the “base market” with lost sales since the tax credits mainly pulled sales forward (at what true cost/benefit?).

You are continuing to propose increase costs in terms of time, effort, product testing and money with your mandates? These costs affect the market and its players accordingly. Why try to force a triple pane window type performance (higher costs) when double pane windows are having sales trouble? Additionally, it seems that some of the larger companies, have more resources and, are potentially interested in mandates if it places them in a competitive advantage. Why not just try to sell a better product, isn't that more fair?

We are still in a great recession and consumers do not want to spend money, much less more money, for even more performance. However consumers will take more performance for less money especially as construction related companies fight to survive. Our market capacity is much smaller (50%) than it was a few years ago and some say it has even more to go? We have not been able to give a price increase to our customers for years. Nonetheless our suppliers, including lab testing companies, have taken big price increases to the fabricator.

So as business and sales remains depressed our margins are continued to be squeezed as costs rise and prices remain flat at best. Next to the economy, more regulations are one of our big future concerns.

We are grateful to be here and are trying to make a living in this market and economy.

I believe in energy and energy savings and I believe that the free markets are the best method.

Thank you for your consideration and time.

Regards,

Dan

**ENERGY STAR® for Windows, Doors, and Skylights Version 6.0 Product Specification
Framework Document October 2011**

I. Introduction and Overview

II. Program Elements Considered for Adoption

a. Structural Requirements

Comment: We agree not to include structural as an Energy Star requirement. We have enough testing and testing costs already.

e. Lifecycle Analysis

Comment: We do not agree to include Life Cycle as an Energy Star requirement. We have enough testing and testing costs already.

III. Program Elements Remaining Unchanged

Comment: It is nice to see some no changes! There have been too many costly changes over the past 3 years already. We have too much testing and testing costs (time, money and efforts).

Our industry (construction) has severe economic problems already and we do not need additional challenges and cost brought on by Government, well intended as they might be.

IV. New Additions to Program Requirements

a. Air Leakage

Proposal: For the Version 6.0 criteria, EPA intends to propose the addition of the following air leakage requirements to align with the 2010 International Energy Conservation Code (IECC) and minimize the energy lost due to air leakage:

Comment: We do not agree to include Air Leakage as an Energy Star requirement for any of the ways suggested. We have enough testing and testing costs already.

b. Installation Instructions

Proposal: To improve access to proper installation information with ENERGY STAR qualified fenestration, EPA proposes requiring that manufacturers make detailed installation instructions available to consumers and installers online.

Comment: We disagree with any further mandates or requirements on general principles.

V. Proposed Revisions to Product Criteria

a. Windows

Proposal: IECC 2012 ratcheted down the SHGC in the South intends to propose that ENERGY STAR windows meet requirements that match the SHGC maximum.

Comment: We disagree in lowering the SHGC any further. This will require a further glass upgrade and raise the cost/price of the product to the manufacture and the end user.

Thank you for the opportunity to express our views.

Regards,

Windowcrafters
2033 Tucker Industrial Rd
Tucker, GA 30084
Phone: 770-723-9900
Fax: 770-723-9902