

Please consider the following comments offered in response the proposed revisions to the ENERGY STAR specification for Roof Products

1. SRI Formula. Seems incomplete - the formula uses values not defined above, such as T_b and T_w ; if you are going to define the values in the formula, then they should all be defined.
2. Maintenance of Solar Reflectance. There seems to be a disconnect between not allowing any cleaning and the manufacturer providing cleaning/maintenance recommendations/requirements. As such, if a property owner follows the recommendations of routine cleaning, then the value measured will be quite different. To measure without any cleaning ignores the responsibility of the property owner to perform routine maintenance. Better stated would be that roofs selected should be representative of those roofs where the owner undertakes routine maintenance as recommended by the material supplier.

Regards,
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