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**Ms Rebecca Duff:**  
**ICFI**

March 26, 2007

**Dear Ms. Duff:**

This letter is in regards to EPA considering adding a thermal emittance requirement to the latest EnergyStar revision for roofing materials.

The Reflective Roof Coating Institute, [www.reflectivecoatings.org](http://www.reflectivecoatings.org) (RRCI) is comprised of 25 roof coating manufacturers who work cooperatively to promote the benefits of reflective roofing products. These benefits transcend not only extended durability, lower life cycle and maintenance costs, but also the benefits of high solar reflectance and high thermal emittance.

The RRCI recommends that EPA establish minimum requirements for thermal emittance as they already have for solar reflectance. Two current activities involving the usefulness of thermal emittance may be appropriate here as additional supporting documentation.

It is noteworthy that the Cool Roof Rating Council (CRRC) lists both solar reflectance and thermal emittance for a purpose, to wit, because each parameter is important in making "cool roof" decisions. If EPA were to ignore one of these coefficients, it would be to deny the marketplace of important information and lead users of the EnergyStar approval into a false sense of compliance without fully understanding the possible limitations of the product used.

Secondly, California Title 24 legislation has requirements for both solar reflectance and thermal emittance in their current law. This legislation was drafted based on literally hundreds of hours of testimony, research input from Lawrence Berkeley National Laboratory and other "stakeholders" involved in this legislation. It was agreed that thermal emittance is an important parameter when considering "cool roofing".

Thank you for your consideration in this matter. If you would like to discuss this further, please feel free to contact me at (610) 265-9222 or by e-mail at [bkirn@nationalcoatings.com](mailto:bkirn@nationalcoatings.com).

Sincerely yours,

**William A. Kirn RRC**  
**President**