



07 October 2008

Richard H. Karney, P.E.
Energy Star Program Manager
Department of Energy, USA
Washington, DC 20585

Dear Mr. Karney,

While ODL supports the DOE's direction in making ENERGY STAR more meaningful, we request more consistency in the U-factor criteria for swinging doors. As outlined in our letter dated May 30, 2008, and acknowledged by all door stakeholders during the August 13, 2008 meeting, the current draft requires a more expensive glazing solution in the ½ lite door when compared to a full lite door. ODL feels that ½ lite and full lite door assemblies should be able to meet ENERGY STAR criteria using the same glazing construction.

ODL recommends utilizing the full lite and opaque door U-factors to determine the ½ lite value. In a door assembly the full lite surface is 49% glazing and 51% core. A ½ lite(22x36 glass) door surface is 28% glazing and 72% core. Applying these ratios to the proposed opaque door value of 0.21, and the full lite value of 0.32 would change the 2010 U-factor for a ½ lite to **0.27** (rather than 0.25). The U-factor in 2014 would be **0.23** as derived using the same logic. For more details see page 2.

ODL also feels the published document's marginal retail cost in Table 29 is somewhat understated and that the payback will be longer than published document timing. A full lite glazed door may meet ENERGY STAR criteria in the current NFRC database but the increased consumer cost increase is likely to approach \$30-\$40 to meet Phase One. The ½ lite glazed door cost increase will be similar to the full lite because it will require a more costly smaller size glazing to meet the proposed side hinged door ENERGY STAR requirement.

If any more information is required, I may be reached at dave.deblock@odl.com or 616.772.9111.

Sincerely for ODL,

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Cc: Alice Dasek, DNR, International
Jim Benney, NFRC
Jeff Burton, AMD
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Background:
 Calculations for half light values
 Using DOE ES published opaque and full light values
 In Draft August 13, 2008 document of

			2009	2014
opaque		u factor	0.21	0.16
36 x 80 = 2880			604.8 si btu	460.8 sib
36 x 80 = 2880	fl	u factor	0.32	0.28
minus core			921.6	806.4
			308.4	235.0
22 x 64 = 1408	49 %		613.2	574.4
		glass	0.436	0.408
36 x 80 = 2880	72.5%	core	438.5	334.1
22 x 36 = 792	27.5 %	glass	345.3	323.1
			783.8	657.2
Proposed half light u factor			0.27	0.23