



24 March 2008

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

Dear Mr. Karney,

At this point in time ODL still believes traditional skylights and tubular daylighting devices should share the same Energy Star requirements for U-Factor and Solar Heat Gain Coefficient.

When the NFRC develops photometric measurement for daylighting performance this may change but until then please modify section 2.5 of the draft to reflect this change. "DOE did not establish new criteria for TDDs and will continue to rate them to the Skylight Criteria"

We believe this because of precedence established by the Department of Energy for other products.

For example, the Energy Star requirements are identical for casement windows and double hung windows. Even though there are slight feature differences between them, they share the same function, location, and materials and therefore have the same Energy Star requirements.

In like fashion, traditional skylights and tubular daylighting devices have slight feature differences but share the same purpose. Both products are very effective at bringing natural light into the living environment, thereby reducing the need for electric lights. Both products are installed into the home in a similar manner and a similar location. Both products affect the energy performance of the home because of their effect on the roof.

In essence, the Department of Energy uses the same standard for various window shapes and types that fill a hole in the wall. Likewise, a hole in the roof that is filled with daylighting fenestration products of various shapes and types should also use the same standard.

For these reasons and others, ODL believes the Department of Energy should use the same standard for traditional skylights and tubular daylighting devices, which share so much in common with one another.

If any more information is required, I may be reached at [dave.deblock@odl.com](mailto:dave.deblock@odl.com) or 616.772.9111.

Sincerely for ODL,

David A. De Block  
Product Code Compliance  
ODL, Inc  
215 E. Roosevelt  
Zeeland, Michigan 49464  
Cc: Alice Dasek, DNR, International  
Jim Benney, NFRC  
Ray Dill, ODL, Inc