



Richard Karney
U.S. Department of Energy

March 24, 2009

Dear Mr. Karney,

As a member of AAMA, Windsor Windows & Doors would typically make any response with respect to the new Energy Star® criteria directly through them. However, we have missed their deadline for response so I am forwarding feedback directly to you.

First, Windsor would like to commend the Department of Energy for their efforts in reducing overall energy consumption as it relates to the housing and fenestration industry. However, we also feel some of the moves being proposed are very aggressive as an initial step and could greatly hinder, and be a financial hardship, on many medium sized window and door manufacturers such as ourselves during these very difficult economic times. Below are some of our comments:

- If appears the performance expectations of window and door products are much higher than those of the entire envelop.
- The u-value improvement requirements in the newly proposed Northern zone, specifically appear to be very aggrissing as compared the initial trade-off proposal. This large an initial jump will hurt manufacturers as they divert resources to address this large an improvement during this period of recession. Conversely, the u-values appear to have been relaxed significantly in the Southern zone.
- Will also have an adverse effect on a lot of good manufactures with good products who currently do not meet all of the criteria forcing some out of business thus eliminating competition and forcing consumers to pay significantly more for their products.
- Many of the changes on certain products require more than just glazing changes and may require significant redesign. In a dramatically down market, many manufacturers are forced to reduce staff to remain viable. To have to dedicate a significant amount of resources to address these changes at this point in time, could be devastating to some companies survival.
- This seems to be a moving target with the latest changes. Knowing how it has been moving, it does not allow much if any redesign to begin until manufacturers know what the final numbers and zones will be. Once final to only have 270 days to in some cases, redesign products, in this depressed market is too tight a window and needs to be expanded. These changes more than likely will also result in recertifying products, yet another expense and more time.

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In closing we again commend the Department of Energy on their efforts to reduce energy consumption, however we feel in light of current economic conditions, the proposed criteria is somewhat strict and/or implementation should be considered at a later date once economic conditions improve. Thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read "Bill Tindell". The signature is fluid and cursive, with a large initial "B" and a stylized "T".

Bill Tindell
Director of Product Development
Windsor Windows & Doors