



Mr. Richard Karney
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
1000 Independence Ave SW
Washington, D.C. 20585

March 25, 2009

Dear Rich,

On behalf of the Aluminum Extruders Council, thank you for the opportunity to comment on the final proposed revisions to the Energy Star® program for Windows, Doors, and Skylights.

In general, we are supportive of the final proposed criteria, which strike a reasonable balance between advanced energy efficiency, technological feasibility, and code limitations.

We do have one major comment, which is related more to implementation and promotion of the program, rather than the specific criteria:

DOE must make it absolutely clear that the scope of the program is for Low-Rise Residential Homes only.

The technical and cost analyses underlying the Energy Star criteria only deal with products used in individual lowrise homes, and do not apply to highrise apartment buildings or nonresidential buildings.

On a weekly basis, our members and colleagues run into situations where “Energy Star” windows are specified for commercial and highrise residential buildings, even though they would almost never meet the structural and durability requirements. This creates confusion in the marketplace, abuses the Energy Star name, and also potentially creates a life safety issue if windows are installed which do not satisfy the building code. Considerable time and cost is wasted trying to correct this misapplication of the Energy Star brand.

Recommendation: All websites, promotional materials, and labels related to the Energy Star program for Windows and Doors must include a disclaimer statement such as *“The Energy Star designation only applies for use in residential homes 3 stories or lower.”*

This is required to be consistent with the technical analysis, and is also consistent with the dividing line used by ICC, ASHRAE, and other programs.

If DOE decides to develop an Energy Star program for commercial glazing, we will be happy to provide advice on how to promote the best of the best, while also properly accounting for added complications in the commercial sector such as life safety and structural requirements in a diverse range of building types.

Finally, we understand the realities of enacting the final proposed criteria as soon as possible. However, we hope DOE does not then consider the job done, and rest on its laurels. We encourage DOE to continue examining criteria for **hurricane impact resistant products**, as well as continuing to support **performance based criteria** which optimize flexibility and cost effectiveness.

DOE should also consider methods to account for other factors that are just as important as energy efficiency, including **environmental sustainability, durability, and long term energy performance**. In particular, sustainability could be addressed fairly quickly through credits for recycled content, or for certifying to an independent program like Cradle-to-Cradle. Please see our previous comments for more details, and as always, we will be happy to assist in any way we can.

Best regards,

A handwritten signature in black ink, appearing to read "Thomas D. Culp". The signature is fluid and cursive, with a prominent flourish at the end.

Thomas D. Culp, Ph.D

W6025 Rim of the City Rd.

La Crosse, WI 54601

608-788-8415

culp@birchpointconsulting.com