

March 25, 2009

Richard Karney
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Mr. Karney,

ProVia Door thanks the Department of Energy for this opportunity to provide additional feedback concerning the revised proposed ENERGY STAR criteria. We want the ENERGY STAR program to be a success and believe government and industry cooperation is essential to achieve this goal. Please consider ProVia's feedback on the two areas addressed below regarding the revised proposed ENERGY STAR criteria:

1. Air infiltration is a major source of energy loss but is not considered in the proposed ENERGY STAR criteria. The current criteria focus on insulation performance only and exclude air leakage. ProVia's calculations determine air leakage at the maximum allowable rate per AAMA/WDMA/CSA 101/I.S.2/A440-05 near equally impacts heat transfer through an entry door compared to the proposed maximum allowable Phase 1 u-factor criteria for entry doors. How can air leakage be ignored? ProVia Door encourages the DOE to make air infiltration a mandatory ENERGY STAR criterion.
2. Broad U-factor and Solar Heat Gain Coefficient (SHGC) variances exist between entry doors of similar construction in the NFRC's Certified Product Directory (CPD). NFRC procedures for determining U-factors and SHGC for entry doors are vague. The THERM and WINDOWS software and user manuals are not optimized for entry doors, which leads to inconsistent simulations.

Several entry doors listed in the NFRC CPD with similar construction and core fill were analyzed. U-factors range from 0.31 to 0.38 and SHGC range from 0.35 to 0.44 for double glazed, clear full lite fiberglass entry doors. We believe these inconsistencies must be corrected or the Phase 1 criteria must be relaxed prior to implementing the proposed ENERGY STAR criteria.

Thank you for allowing ProVia Door to provide feedback concerning the revised proposed ENERGY STAR criteria. We ask that you consider ProVia's recommendations to the proposed criteria and address the listed concerns.

Sincerely,

Chris Nolt
Test & Certification Engineer