



**To:** Richard Karney  
U.S. Department of Energy  
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**Date:** March 25, 2008

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**cc:** Emily Zachery  
Steve Hopwood  
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**Subject: ENERGY STAR® Revised Draft Criteria**

Thank you for allowing Masonite the opportunity to provide input regarding the Revised Draft Criteria and Report for ENERGY STAR windows, doors and skylights that was published on March 11, 2009. As a leader in the side-hinged door industry and an active ENERGY STAR Partner, we respectfully submit these comments for your consideration.

We appreciate the consideration that has been given to stakeholder input and the continued efforts to solicit stakeholder comments. We also continue to support separate criteria for side-hinged doors and believe the simplification is in the best interest of the consumer.

However, we do not support a maximum SHGC of 0.30 for > ½-lite doors. We believe 0.30 does not achieve a balance between the positive affects of solar heat gain in northern climates and the negative affects of solar heat gain in southern climates. We suggest that it be set at 0.35 maximum. This better reflects a true balance as evidenced by the range of SHGC set for windows (0.27 in Southern up to UNLIMITED in Northern). More importantly, it allows for the use of low-e coatings in the Northern Zone that maximize the benefits of solar heat while minimizing heat loss. This adjustment would not negatively affect energy savings, as DOE analysis revealed that a 0.05 increase in SHGC would be the equivalent energy performance to only a 0.01 increase in U-factor. Therefore, we believe 0.35 is the appropriate maximum value and request that the SHGC value for > ½-lite doors be modified.

Please let me know if you need additional information. Thank you for your consideration.

Eldred Reid