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Brian T. Evans, Sr.
President & CEO

March 18, 2009

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

Dear Mr. Karney:

We submit as further industry input the following views with respect to the Windows, Doors and Skylights Revised Draft Criteria and Report published March 11, 2009.

The efforts to date to secure a rounded representation of the facts pertaining to increasing the Energy Star product criteria are commendable. It would appear however that further definitions may be needed when considering impact products in hurricane borne regions. With full appreciation to date for the efforts of all involved in this important matter we offer the following input.

Hurricane zones require products that meet or exceed specific design pressures and testing approvals. Necessary design pressures are often times only achieved with aluminum products designed with substantial framing and glazing systems. This type of framing system mandatory for adequate hurricane safety may offset some of the energy efficiency advantages found in other product types such as wood or vinyl.

Our feeling is that the program should properly balance the need for the strongest and safest hurricane protection with that of energy efficiency. One really cannot compare the impact market equally to the needs of a non-impact market without sacrificing strength, safety and protection. Consumers that sacrifice safety for marginal increases in efficiency, marketed by the Energy Star® Program may not be making the best choice for their particular situation.

Given the decision of choosing protection for lives and property over slight improvements in energy savings should therefore be considered. In hurricane zone markets, there are aluminum products that meet the current energy star criteria. With the proposed changes however, added product costs necessary to comply are high while providing little additional improvements in efficiencies. The payback for a consumer under the proposed criteria many times will not support the added cost.

For example, U value improvements in south Florida are much less important for energy efficiency gains than SHGC improvements. In order to improve performance in U values, one approach is to reduce the strength of the product design by reducing the frame materials and replace it with glass. As a result, many times design pressures are no longer obtainable or are available only for the lowest levels of acceptable coverage. Even under today's standards, there are instances where single family residences simply can not use alternative framing materials and meet the required design pressures.

Because of the power behind the marketing of the Energy Star® Program and the noted appeal it has with consumers we suggest a separate set of performance criteria for impact products such as is currently in place so that consumers are not inappropriately moved to sacrifice safety while making relatively small gains on energy savings.

Our proposal is to maintain the current criteria in the southern zone for impact products. At the very least, we would request that current requirements for hurricane zones with exposures of 130 MPH and greater be maintained.

Thank you for your consideration.

Sincerely,



Brian T. Evans, Sr.
President & CEO