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November 14, 2008

Richard Karney
Energy Star Windows® Program Manager
U.S. Department of Energy
Building Technologies Program, EE2J
950 L'Enfant Plaza, SW
Washington, DC 20024

RE: Criteria Revision – Public

Dear Mr. Karney:

On behalf of the Glazing Industry Code Committee (GICC), I would like to thank you for the opportunity to provide stakeholder input on proposed criteria for the Energy Star program for Windows, Doors, and Skylights.

Since 1983, GICC has represented the full spectrum of architectural glass and glazing interests throughout North America. Its 15-member trade associations and companies include glazing, window film, and sunroom trade associations, low-e producers, glazing fabricators, fire and safety glazing suppliers, and window and wall manufacturers. A fundamental commitment of GICC is to promote the appropriate use of glazing to maximize life safety and energy efficiency. While GICC's bylaws require 75%, or more, of its members to support a proposal in order for consensus to be achieved, it should be noted that the consensus positions/recommendations expressed in this letter are not always supported by all of GICC's members.

After further review of the published draft criteria and analysis, we would like to reiterate our key positions.

1. In pursuing greater energy conservation, **maximizing the use of trade-offs** will result in greater cost effectiveness.

Trade-offs offer equivalent energy savings while expanding the range of available products, stimulating competition, and reducing cost. Alternative methods and trade-offs also promote investment in new product development for the next generation of fenestration.

GICC strongly supports DOE's commitment to allow SHGC and U-factor trade-offs in both the north and south. We applaud DOE's effort to include an annual energy performance metric in the north, and based upon the results of the ICC final hearings, performance-based trade-offs in the south may also be restored.

2. To maximize energy efficiency, Energy Star should encourage the use of **low SHGC products in the south** and **high SHGC products in the north** through use of a minimum SHGC in the north.

GICC is committed to the use of renewable energy resources. High SHGC products, which are available from all of the low-e producers, allow northern homeowners to capture the renewable energy of the sun to reduce heating costs. We believe DOE is missing an opportunity to significantly increase energy savings in the north by not including a minimum SHGC.

Furthermore, DOE is in the process of establishing very low SHGC requirement in the south, which is appropriate for that region. However, it would be misleading to homeowners to allow these very low SHGC products (e.g. 0.15 – 0.25 SHGC) to qualify for the Energy Star label in the north.

Likewise, GICC believes the SHGC cap in the north is unnecessary, inconsistent with DOE's energy savings analysis, and could inhibit new high performance products.

3. GICC is committed to promoting both energy efficiency and life safety. Energy Star should establish separate requirements for **hurricane impact resistant products** which promote both energy conservation *and* protection of life and property.

Hurricane impact resistant products are simply different from normal windows in construction and cost. Energy Star sets separate requirements for windows, swinging doors, and skylights based on the very different design and performance of these products. The same should be true of hurricane products. Separate requirements will help ensure that neither energy efficiency nor strict life safety requirements are ignored. For these same reasons, the ICC recently adopted separate criteria for hurricane products for the 2009 IECC and IRC.

4. Although DOE is announcing proposed 2013 criteria now, GICC believes DOE should consider another round of stakeholder input and possible revisions nearer to the proposed implementation date.

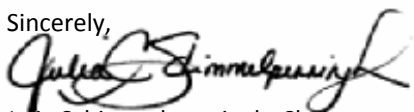
Establishing criteria not intended to take effect until 2013 interjects some speculation into the Energy Star Windows program, forcing DOE and stakeholders to "guess" where cost effective technologies might be in the marketplace at that time. Although GICC appreciates the need for DOE to give industry advanced notice of its expectations, DOE should also make it clear that future criteria will be subject to further review and stakeholder input nearer to the proposed implementation date. This will ensure that the technological feasibility and cost effectiveness of complying products will be more accurately assessed at that time.

5. Finally, until a "commercial" Energy Star program is available, DOE should clarify in its marketing materials that the current program applies only to low-rise residential buildings.

This may seem like an obvious clarification, but architects are out of ignorance or confusion often inappropriately specifying Energy Star labeling on large commercial projects.

Thank you for the opportunity to provide input on the proposed Energy Star criteria. GICC looks forward to working with DOE and other glass and glazing industry stakeholders on the evolution of the Energy Star program for Windows, Doors, and Skylights.

Sincerely,



Julia Schimmelpenninck, Chair
Glazing Industry Code Committee