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1380 Wayne Avenue • Indiana, PA 15701



March 27, 2009

Richard Karney
ENERGY STAR Products Manager
U.S. Department of Energy

Dear Mr. Karney:

We at Gorell have always been a strong supporter of the ENERGY STAR program. As such, we've been closely following your efforts to raise the bar for the program. We have provided you with feedback on your proposed criteria revisions several times in the past and are pleased with many of the changes you've implemented as a result of this feedback.

Below is the opinion we'd like to offer about the revised draft of the criteria.

We don't think ENERGY STAR has gone nearly far enough with the proposed criteria changes. The reason for the ENERGY STAR program, as we understand it, is to stimulate consumers to save this country energy by improving the energy efficiency of existing homes. That being the case, the tougher the achievable standards are, the better for our country. Manufacturers have the ability to make windows with a U-value well under 0.20 today—so why is ENERGY STAR setting the standard more than 50 percent worse, at 0.30? Industry technology will continue to improve, so the proposed criteria are short-changing consumers who buy windows today. Most consumers will only replace their windows once, so missing the opportunity to save the maximum amount of energy now will have a long-term impact.

We believe ENERGY STAR's U-value standards should be set at or close to 0.20—at most, 0.25—to maximize the benefits for our country and for homeowners. Although this is probably not what a lot of manufacturers want to hear, we need to focus on the reason for the ENERGY STAR program. The requirements should not be based on what is easy to achieve. We need to do what is best for our country and its citizens, and that means saving more energy to work toward energy independence.

We continue to strongly support ENERGY STAR and hope that together we can help consumers drive down their energy costs—and help the country as a whole use less energy.

Best Regards,

Wayne Gorell
President & CEO



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the National Crime Prevention Council