



Richard H. Karney, P.E
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Re: Criteria Revision - Public

Solatube International, Inc., the leading manufacturer of TDD products, is responding to the draft criteria published March 11, 2009, specifically item number 5 "Suspended Tubular Daylighting Devices (TDDs) from the program until industry collects a sufficient body of test results".

We hereby request that TDD's not be suspended from the ENERGY STAR program. Solatube International concurs with the position of other TDD manufacturers that TDD's should share the same ENERGY STAR requirements as traditional skylights for U-Factor & Solar Heat Gain Coefficient (SHGC). As such, we request that section 2.5 of the draft be modified to conclude that DOE did not establish new criteria for TDD's. Although we suspect the current methodology and criteria for skylights may not be ideal for the TDD sub-category, we will work with the existing criteria until such time that a change is warranted and alternatives are developed through the NFRC process.

If the proposal is adopted and TDD's are suspended from the program, the impact to the TDD manufacturers could have long lasting effects. We will be penalized by losing the ENERGY STAR rating that is recognized by consumers worldwide. We have already received multiple inquiries regarding the loss of ENERGY STAR. The announcement of the proposal has led our partners and customers to erroneously conclude that our products are no longer ENERGY STAR rated, bringing into question the energy efficiency of our products. This is an immediate threat to sales revenue for Solatube International and its partners.

Solatube International has been a leader in the industry, providing products that reduce energy consumption. We continue to innovate and advance the technology of TDDs, resulting in the availability of products that meet or exceed the energy efficiency standards established by DOE. By adopting the proposal set forth, it is our opinion that DOE will send the wrong message to consumers about the energy saving benefits of TDDs.

Thank you for your consideration and we look forward to continued participation in the ENERGY STAR program.

Regards,

Robert E. Westfall, Jr.
President
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