



Mr. Richard H. Karney
Energy Star Program Manager
U.S. Department of Energy
1000 Independence Ave SW
Washington, D.C. 20585

November 14th, 2008

Dear Mr. Karney,

Thank you for the opportunity to convey TRACO's point of view on the current Residential Energy Star program and its ongoing criteria revision.

- The biggest challenge faced by TRACO and many other commercial manufacturers is the frequent misuse of Residential Energy star program in commercial projects. We often see Residential Energy Star criteria being specified for commercial projects. We have to keep explaining to architects and general contractors that the current Energy star program is only for fenestration products going into residential buildings. We propose a two prong solution to overcome this problem:
 - DOE should put more emphasis on the fact that the current Energy Star program is applicable to fenestration products for residential buildings only. We request DOE to create more awareness about this fact and also make changes to the Energy Star label to emphasize this point. The Energy star label should contain the information that it is applicable to fenestration products for residential buildings only and should also include the definition of 'residential building' e.g. three stories or less as per the International Code Council definition.
 - Another solution to the above mentioned problem would be to have an Energy star program for non-residential (commercial) fenestration products. DOE should be proactive towards developing an Energy Star program for commercial fenestration products. It would provide an easy way to differentiate between the Residential and Commercial Energy Star programs. Moreover, it would provide architects, contractors, and consumers in the commercial industry with an excellent way to select energy efficient products.
- TRACO believes that Energy Star evaluation criteria should incorporate a product's overall energy performance and its environmental impact over its life cycle. We do not have such rating methods at this point, but we urge DOE to work with the industry and rating organizations towards developing a more meaningful rating methodology for fenestration products which would incorporate these criteria and provide a comprehensive indication of a product's performance.
- TRACO supports the Aluminum Extruder Council's proposal for recycled content credit to promote the use of recycled content in fenestration products for obvious environmental benefits.
- The final Energy Star criteria for 2009 and 2013 should be made simpler than the current proposed draft to make it easy for all stakeholders. For example, in 2013 the U-Factor requirement for ES zone 4 should not be more stringent than ES zone 5.
- We hope DOE will keep an open mind about revising the criteria for 2009 and 2013 if any changes in the NFRC calculation procedures for fenestration products result in significantly different performance values as compared to the current procedure.

Thank you for your consideration. Please feel free to contact us if you have any questions.

Sincerely,

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