

Subject: ENERGY STAR® criteria revisions

Thank you for allowing us the opportunity to provide input regarding the upcoming ENERGY STAR revisions. Taylor Building Products would like to submit the following comments for your consideration concerning the proposed draft side-hinged door criteria and analysis published on August 6, 2008:

Taylor Building Products support separate criteria for glazed and opaque doors. However, we believe that any differentiation based on the quantity of glazing is not in the best interest of the homeowner. These values could persuade a consumer to purchase a lesser performing product (3/4-lite) over a higher performing product (1/2-lite) simply because it is ENERGY STAR qualified. This would result in less energy savings, not more.

Door Type	Phase 1	Phase 2
Opaque	U = 0.18	U = 0.16
¼ & ½ Lite	U = 0.27	U = 0.23
¾ & Full Lite	U = 0.32	U = 0.28

If criteria are variable by percent of glazing, we request the ½-lite values be adjusted to reflect the same glazing required by the full lite values (see Table 1). Simulations have demonstrated that the glazing required to attain a 0.32 U-factor in a full lite door will result in a 0.27 U-factor in a ½-lite door of identical construction and glazing.

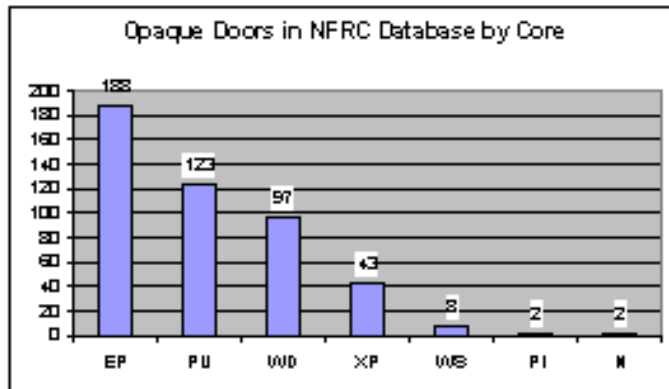


Figure 1

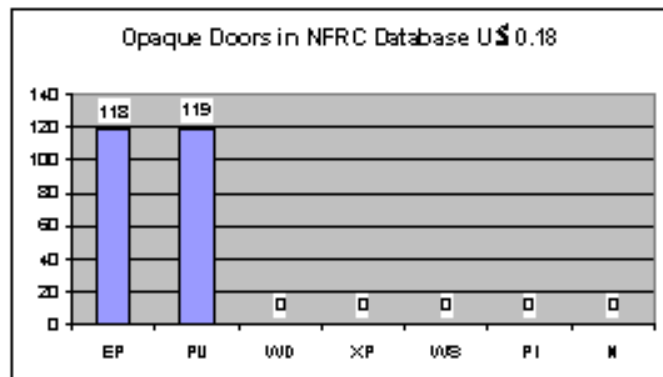


Figure 2

Taylor Building Products acknowledges that there is great opportunity for improvements in efficiencies with opaque door units. Opaque entry doors constitute a large percentage of the market. Therefore, we believe a more aggressive value for Phase 1 would better differentiate energy efficient products. Of the 463 opaque door records ($VT \leq 0.00001$) in the NFRC database, 237 of them already perform at 0.18 or better (Fig 1 and Fig 2). We believe this would be an appropriate value that is achievable with current technologies.

Taylor Building Products discourage the implementation of maximum SHGC. Lower U-factor requirements and the elimination of climate zones greatly reduce the importance of SHGC limitations. By their nature, products with low U-factors will also have low SHGC. The attempted “balance” is not necessary. We continue to request that the interval between program criteria changes be at least four (4) years and would support a Phase 2 effective date 4 to 5 years after the Phase 1 effective date.

As a member of the Association of Millwork Distributors, we appreciate the Energy Star Program and look forward to partnering with you in future efforts to promote safe, affordable, energy efficient door products.

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