

Richard Karney  
Energy Star Windows  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

Dear Rich:

Marvin Windows and Doors is one of the largest made-to-order wood window and door manufacturer in the world with nearly 4500 employees spread across the nation. We are proud of our partnership with the Energy Star windows program, which is an integral part of our environmental commitment.

We participated in the process conducted by the Department of Energy last fall to determine new specifications for Energy Star windows. After those new specifications were announced in October, like many other Energy Star window manufacturer partners, we spent considerable time and money to revise our labeling process, generate new catalogs and prepare to implement the new program on January 1, 2002. You can imagine how surprised and unhappy we were to learn in late December that the Department intended to delay implementation and may be re-evaluating the new specification. Obviously, a change in the specification at this late date would harm our company and others in the industry, not to mention undercutting DOE's and Energy Star's credibility.

Marvin strongly supports the new specification announced last October. We recommend that the Department move quickly confirm the new specification so that we and other manufacturers can move forward to promote more energy efficient windows. The new climate zone boundaries and requirements properly balance the need for a low U-factor for significant heating climates with the importance of summer solar heat gain control throughout much of the nation (specifically, the new standard reasonably extends the .4 SHGC requirement up to 6000 heating degree days).

Although our national headquarters is located in the far north, we very much understand the need to control summer solar heat gain even in northern climates to ensure comfort, provide cost savings, reduce utility summer peaks and to protect the environment. This is demonstrated by our commitment to build windows that keep the heat inside homes in the winter and outside homes in the summer. As a window manufacturer, we have spent considerable effort to design windows with the properties best suited to our nation's climate. We can choose among many different types of glass and a number of different manufacturers, yet we have decided to emphasize glass that has both low U-factors and SHGCs for most of the country. We think the new specification makes the same reasonable choice.

Please call if you have any questions.

Sincerely,

James C. Krahn