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## Comments on fenestration criteria

I have solicited feedback regarding the proposed changes to the 2028 energy code fenestration criteria from my clients at the Glazing Industry Code Committee and the Aluminum Extruders Council, as well as the performance workgroup from the Partnership for Advanced Window Solutions (PAWS). Very briefly, I have not heard any objections to the proposed U-factor changes. The proposed changes are incremental, cost justified per the cost effectiveness analysis, and achievable with well-established technologies already in use across the country.

The only feedback I did receive was that the references to NAFS 2017 (North American Fenestration Standard) in the multifamily tables TABLE 303.3(1) [TABLE 170.2-A] and TABLE 303.5(2) [TABLE 180.2-B] should likely be updated to the latest NAFS 2026, or at least the NAFS 2022. There are not really any changes of note for Title 24 purposes, but it makes sense to reference a more up to date version of the standard.