

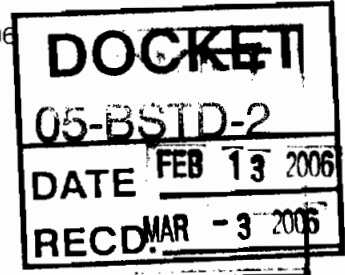


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# STEEL DOOR INSTITUTE

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February 13, 2006



Ms. Elaine Hebert, Contract Manager  
Efficiency, Renewables, and Demand Analysis Division  
California Energy Commission  
1516 Ninth Street, MS-25  
Sacramento, California 95814

**Re: 2008 Update to the Building Energy Efficiency Standards  
Docket Number 05-BSTD-2  
Section 10-111 Certification and Labeling of Fenestration Product U-Factors,  
Solar Heat Gain Coefficients and Air Leakage**

Dear Ms. Herbert:

The Steel Door Institute is a national trade association comprised of eleven (11) manufacturers of commercial steel doors and frames. The present membership represents approximately 80% of the commercial standard steel doors and frames sold in the United States.

We are writing to recommend revisions to Section 10-111 of the Building Energy Standards. Specifically, we recommend that the Commission eliminate "the designation of the National Fenestration Rating Council ("NFRC") as the supervisory agency responsible for administering the state's certification program for fenestration products". We request that this recommendation be considered at the Staff Workshop scheduled for February 22-23, 2006.

While we support the goal of ensuring that consumers receive accurate information regarding U-factors and solar heat gain co-efficients (SHGCs), the designation of the NFRC as supervisory agency is no longer necessary to achieve that goal. It is our understanding that Commission designated the NFRC as the supervisory agency in order in response to certain fraudulent practices involving certification of energy ratings for fenestration products in the 1980s. While intended to prevent fraudulent practices, the designation has had the unintended consequence of preventing qualified testing organizations from competing in the market for providing fenestration certification services.

Designating the NFRC as the supervisory agency has the effect of designating the NFRC as the sole provider of certification services in California. This is because the NFRC requires that any testing or certification organization that participates in its program must use NFRC's label to demonstrate compliance. As a result, competent certification organizations that use other certification marks, even if they provide superior service, are excluded from the California market.

It is not necessary to so restrict competition to guarantee the integrity of California's certification program for fenestration products. Rather than rely solely on one supervisory entity, the Commission should require that organizations that wish to test for U-factors or SHGCs in accordance with NFRC standards be "an accredited, independent laboratory", as is done in the International Energy Conservation Code.

This change would allow a more competitive market for testing and certification services, with attendant consumer benefits. Moreover, the approach we advocate is similar to the approach California uses with respect to other building certification programs, which suggests that the Commission can adopt the proposed changes with confidence.

## *The Industry Standard for 50 Years*

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26449

**2008 Update to the Building Energy Efficiency Standards**

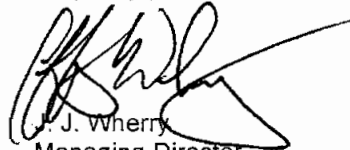
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We appreciate your consideration of this proposal and are available to provide additional information if desired.

Very truly yours,



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Westlake, OH 44145

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And First Class Mail