

**DOCKET**

**10-BSTD-01**

DATE JUL 15 2011

RECD. JUL 15 2011

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July 15 2011

California Energy Commission  
Dockets Office  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Docket No. 10-BSTD-01**

I am writing to you to comment on the proposal to change the prescriptive aged reflectivity requirement within Title 24, from 0.55 to 0.70 or possibly 0.67. It is my understanding that this change, if adopted, would become effective January 1, 2014.

We object to the proposed change on the following grounds:

1. The CEC has not presented any data demonstrating any significant benefit to making such a dramatic change.
2. Such a change would eliminate at least half of the products currently meeting the CEC prescriptive requirements, reducing consumer choice and competition.
3. Many products with very long track records of proven performance in the State will no longer be eligible for use under the prescriptive requirements, potentially pushing consumers to products with less history, and ultimately costing the State's building owners more money over time.
4. The timeframe does not allow manufacturers to properly adapt existing products.

You appear to be adopting the next "miracle in a can" approach without any thought as to the primary purpose of roofing: to keep the building, the occupants and the critical items inside the building dry. The history of roofing is replete with movements such as these. It has cost consumers and state and local governments millions of wasted taxpayer dollars to clean up the mess. You are requiring consumers to purchase, at increased costs, untested and unproven products to further a goal you cannot demonstrate will be achieved with this measure. At a time when government bodies are broke and consumers must squeeze every penny out of a dollar, your insistence on additional spending without proven benefit and with a high probability of failure is unconscionable. I strongly object to any changes being made and implemented in the 2013 code release. Thank you for this opportunity to comment on the proposed change.

Please do not hesitate to contact the undersigned should you have any questions.

Sincerely,

  
John Haley  
CSLB #285898, B; C-39