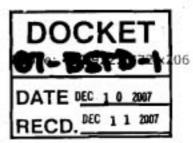


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December 10, 2007

Subject: 2008 Building Energy Efficiency Standards for Residential and Nonresidential Buildings 45-Day Language Comment Provided by the Cool Metal Roofing Coalition

Mr. Chris Gekas and Mr. Mazi Shirakh California Energy Commission 1516 Ninth Street, MS-25 Sacramento, CA 95814-5512

Dear Messrs. Gekas and Shirakh,

The Cool Metal Roofing Coalition forwards the following comment for the 2008 Building Energy Efficiency Standards for Residential and Nonresidential Buildings 45-day Language:

Page 209, Section 151 (f)11.B Roofing Products, states, "Low rise residential buildings with low-sloped roofs in climate zones 13 and 15 shall have a minimum aged reflectance of 0.55 and a minimum emittance of 0.75 or a minimum SRI of 0.65." Obviously, the SRI value is expressed incorrectly as a percent. Also, to be consistent with similar language in Section 152, the actual SRI value should be 64 rather than 65.

We hope this minor editorial comment is helpful.

Sincerely,

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Gregory L. Crawford Executive Director Cool Metal Roofing Coalition

