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July 20, 2011

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

Re: Docket No. 10-BSTD-01

We are 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 our understanding that this change, if adopted, would become effective January 1, 2014.

CFFA is an international trade association whose members manufacture chemical fabrics and film used in numerous applications such as upholstery, vinyl roofing, pool liners, and transportation interiors. The Vinyl Roofing Division is represented by the leading manufacturers of PVC roofing who have been participating as stakeholders in the discussion of the proposed revisions.

CFFA objects 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.

We strongly object to any changes being made and implemented in the 2013 code release. The CEC should work with all stakeholders to map out a comprehensive road map for the future that would set reasonable targets and define time frames that would allow for the appropriate product development cycles.

Thank you for this opportunity to comment on the proposed change. Please do not hesitate to contact us should you have any questions.

Sincerely,

SUSAN M. YOUNG

SMY:cmd
 cffa

cc: CFFA Vinyl Roofing Division