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July 15 2011

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

DOCKET**10-BSTD-01**

DATE JUL 15 2011

RECD. JUL 15 2011

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.


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.

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 the undersigned should you have any questions.

Sincerely,


Jeff Allison
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