

Bldg. Code



March 15, 2012

To: Paula Ford, Clerk of the Commission  
Florida State Department of Business and Professional Regulation  
Mo Madani, Florida State Department of Business and Professional Regulation

From: Richard Wright, Chief Operating Officer  
Custom Window Systems, Inc.  
1900 SW 44<sup>th</sup> Ave.  
Ocala, Florida 34474

Subject: Re: Chapter 553.902, 553903, and 553906 and Florida Building Code, Energy Conservation, 2010 with supplements, Sections 101.4, 101.4.1, Table 101.4.1 and Section 402.3.6

Custom Window Systems, Inc. has been manufacturing windows in Ocala, Florida since 1986 and to this day, over ninety percent of the windows we manufacture are sold in Florida. Since the inception of our company, energy conservation has been a major goal. Custom Windows was the first Florida window manufacturer to achieve the Energy Star rating and all of our vinyl products still have it. Although we make both vinyl and aluminum windows, we strongly support the 2010 Florida Building Code as it is written and we will oppose any modifications to the code that reduce or mitigate the energy conservation measures contained in the 2010 code. Although we are members of the Aluminum Association of Florida, we do not agree with the position that organization has taken with regard to energy.

It is very clear that fenestration products can be produced from aluminum that will meet the provisions of the Energy Conservation portion of the code. Only two simple and time tested techniques are required in order for aluminum windows to meet the .65 U factor and the .30 SHGC. To meet a .65 U factor, glazing needs to be a two panel glazing system with a sealed airspace. To meet the .30 SHGC, glass needs to be either coated or tinted. These are simple technologies in wide use in the fenestration industry for many years. There is simply no excuse not to employ these technologies in Florida. The initial additional cost to the homeowner for this relatively minor changes over single glazed clear glass is quickly repaid by lower energy bills and in addition, the reduced power requirements also reduce air pollution.

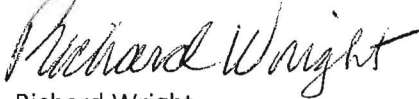
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Of course the ultimate energy solution for fenestration products is exploring the use of other framing materials in windows, such as poly vinyl chloride or clad wood, which is already required to reach the thermal values required for an Energy Star rating.

Custom Window Systems strongly supports energy conservation measures in the State of Florida and we appreciate your consideration of our position.

Very Truly Yours,

A handwritten signature in black ink that reads "Richard Wright". The signature is written in a cursive style with a large, prominent initial "R".

Richard Wright

Chief Operating Officer

Custom Window Systems, Inc.