



Keep Aluminum Windows Special KAW Funding Drive for 2008 Frequently Asked Questions

What Is KAW? Does it Really Matter to Me?

Building and construction represents over 30% of the demand for aluminum extrusions in the U.S and Canada. That's about 1.3 billion pounds per year, or \$2.6 billion. Most of this market is subject to regulations imposed by government agencies and building code officials. KAW focuses its resources on monitoring these areas and educating officials. Without KAW, and without AEC's leadership in this area, aluminum could well be regulated out of this most important of all markets. Even extruders and suppliers who are not directly involved in the B&C market would be hurt by losses to competing materials.

How Did KAW Get Started?

In 2002, the KAW campaign was started in response to member concerns that a revision to the U.S. Department of Energy's residential Energy Star program was about to create a set of criteria that would harm – perhaps kill – the market for aluminum windows and doors. These members also knew that the program could be improved for consumers and for energy saving, while still “keeping aluminum windows” as a choice in the market. But this was possible only if AEC members organized an effort to educate and change the Energy Star proposal. After an 18-month effort, an AEC-led coalition succeeded in this initial goal. KAW had achieved its first major victory.

Why Has KAW Continued After That First Victory?

The initial Energy Star battle was the tip of the iceberg. AEC learned that competitive materials and opposing interests were consistently engaged in these regulatory and code discussions. To avoid another “near miss”, aluminum must be too. AEC engaged a consultant who would be both our monitor and advocate. Since 2005, Tom Culp of Birch Point Consulting has been involved at all the right levels and a beacon of aluminum advocacy. It was Tom that first noticed this “battle of materials” moving from the residential to the commercial arenas.

What About Recent Activities and Future Plans?

In the past three years, KAW representatives – both paid staff and AEC member/volunteers – have been actively involved advocating within the following organizations:

- National Fenestration Rating Council (NFRC)
- International Code Council (ICC)
- International Energy Conservation Code (IECC)
- American Architectural Manufacturers Assn. (AAMA)
- American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)
- U.S. Department of Energy (in both residential and commercial versions of new Energy Star versions)

A recent update on some of these activities, as well as future plans, is included on the reverse side of this page.

How is KAW Supported and Funded?

Originally, the KAW program was overseen by AEC's B&C Marketing Subcommittee. However, as activities grew, the KAW program spawned a separate committee, which includes participation by non-AEC companies, e.g. aluminum window manufacturers. In establishing the AEC Window Manufacturers Advisory Subcommittee, AEC President Rand Baldwin said, “Manufacturers in the aluminum fenestration niche have no entity looking out solely for their interests. With this Subcommittee we are now creating a place for their concerns to be heard and actions taken.” About 5% of AEC's annual budget is allocated to KAW. In addition, another 5% comes from separate contributions by AEC members and others.

What Can I Do to Help?

AEC needs your support to continue KAW. On the 2008 dues statement is an optional KAW “check-off box”. As you review your dues, please consider checking a box and add this amount to your dues payment. AEC hopes all members will contribute at least \$100. Thank you!

(See reverse side for an update on KAW activities and plans)

Highlights of Recent Activities

by Tom Culp, AEC Consultant for KAW

NFRC (Commercial)

Development of the problematic CMA rating program for commercial fenestration continued at the NFRC meeting in November. The research project to develop new frame grouping rules and default worst-case frame values was completed. That's good news as both would reduce the amount of physical testing and simulations required to enter multiple products into the frame database. We succeeded in fending off an attempt to completely remove all default values, although there will be a second review, which we will monitor.

The National Glass Association finally joined the fray, taking a strong position that CMA should be abandoned. This differs a little from the AEC, AAMA, GANA, IGMA position where we acknowledge the potential value of a CMA technical procedure (which is akin to AAMA 507), but have grave concerns about the cost effectiveness and complexity of the certification program.

NFRC (Residential)

A new rating procedure for aluminum storm windows was balloted. The goal is to allow these products to be easily rated, but also clearly distinguish them from replacement products to avoid confusion between these two different markets. Although the ballot was passed, the proposed rating scheme represents a significantly different approach than the current residential method, so it was sent back for one more round of comments.

ICC (Energy Code)

The Window and Door Manufacturers Assn. (WDMA) is trying to change commercial fenestration requirements to require 0.35 U-factors for fixed and operable windows. This is ridiculous when looking at real commercial products. AEC will oppose it and it should be easy to defeat, but we can't take it lightly either. It will be interesting to see what position Pella (who is influential at WDMA) will take, now that they also own EFCO.

There are also efforts to trying removing the projection factor shading credits which encourage the use of horizontal overhangs. This is the exact opposite of our proposals to expand the use the shading credits to also include vertical fins and other means of shading.

There are also several proposals promoting the use of skylights and daylighting, including from AEC. Finally, there was a proposal submitted on L/175 deflection limits that the KAW committee already voted to support.

Of interest to residential aluminum, there are proposals targeting U-factors and Solar Heat Gain Coefficients in southern zones, with U factors ranging from 0.4 to 0.65.

Energy Bill (U.S. federal legislation)

As reported in AEC's Washington Report for October, the U.S. comprehensive Energy Bill is still being held up in Congress. The issue of most interest to KAW is the mandatory increase in the energy codes by 30% in 2010 and 50% in 2020. The National Association of Home Builders and the National Association of Manufacturers are still strongly opposed to the bill as drafted. But even if the current bill fails, the pressure to increase the codes by 30% will remain intense. AEC must remain engaged.

Advanced Building Coalition

The Advanced Building Coalition, of which AEC is a member, held its first open forum on October 24 to discuss the looming 30% increase in the energy codes. We had almost 50 participants from across the building industry. Speakers included DOE, HUD, the head code official in Michigan (and former ICC president), Pacific Northwest National Lab, Washington State University, NAHB, and more. There was a very positive response from participants and also privately from DOE. I think we succeeded with many of our objectives:

- (a) establish ABC as the main forum to discuss increasing the code and making the ICC process work (as opposed to the federal government stepping in),
- (b) outmaneuver opposing attempts to gain DOE's sole support for their agenda,
- (c) establish our group's philosophy as the key criteria for judging the merits of different proposals (e.g., whole building approach, material neutral, cost-effective etc.)
- (d) enhance our credibility for testifying at the code hearings.

Energy Star

DOE has begun a new round of updating its Energy Star program for residential windows, doors, and skylights. AEC met with DOE in October to discuss our position on several issues. DOE will release a technical analysis and hold a stakeholder meeting in early 2008.

It appears DOE will propose a modest increase in efficiency for 2009, followed by more aggressive targets in 2012 and 2015. No specific criteria have been announced. But, of interest to aluminum, DOE appears to again be responsive to many of our concerns. They will consider (1) performance-based trade-offs wherever technically feasible, (2) having separate criteria for impact-labeled products due to the different structural performance, (3) expanding the southern zone to more closely match IECC and include Dallas and Phoenix.

They also understood AEC's concern that the Energy Star program is being misapplied to high-rise projects, without heeding more stringent structural and durability requirements. DOE will clarify that the Energy Star program only applies to low-rise residential. The DOE also told AEC that they want to also explore an Energy Star program for commercial windows, and that they will welcome AEC's early involvement.