



Summary of NFRC CERTIFICATION PROGRAM PARTICIPANT SURVEY

TOPIC: THIRD-PARTY IG CERTIFICATION

**Deadline was
February 9, 2007**

**Survey was conducted
by e-mail.**

**Approximately 400
participants contacted.**

**156 Participants
responded.**

1. Does your company purchase insulating glass units used in NFRC-certified products from an external IG supplier?

80 responded affirmatively.

2. If so, are the insulating glass units third-party certified?

Of the 80 responses, 62 indicated the units were 3rd party certified.

3. Are any of your IG units used in NFRC-certified products manufactured in-house?

106 responded affirmatively.

4. If so, are they third-party certified?

Of the 106 responses, 60 indicated the units were 3rd party certified.

5. How many IG models do you use in your NFRC-certified products? (A model is usually defined by different sealant or spacer system) **Average was 2.6 models. 5 respondents indicated that they used 10 or more models (1 of the 5 indicated 30).**

6. What percentage of those models is third-party certified?

Average was 59%. 75 respondents indicated 100%

7. For specific comments received see next page.....

43 comments received total.

**21 comments not in favor
5 comments in favor**



IG Certification Survey Manufacturer Comments

1. I recommend that we develop the rules and open it up for manufacturers to participate immediately with a mandatory date agreed on by the membership not to exceed two years. Options could be: Durability only; Include gas fill; Include gas retention.
2. We have regularly scheduled audits of our glass fabricating methods and practices by our spacer provider
3. The availability and length of time for IG testing makes it some what troublesome. We guarantee the IG units to the homeowner as we sell direct to the builder. Consequently we monitor our failures very closely. We do a daily QC inspection on all of our IG departments.
4. I support requiring 3rd-party IGU certification as a prerequisite for NFRC certification.
5. I have mixed feelings on this issue. I purchase products for my windows and doors from Energy Star partnered companies as well as NFRC rated products that will contain Energy star glass. I believe this is all we really need.
6. Excellent idea!
7. I don't believe it's necessary for three reasons: 1. Manufacturers are required to test the glass in the window to be AAMA certified for structural ratings. Therefore, most manufacturers already test the glass they make to the IG test standards. Requiring certification would only add to the cost of manufacturing. 2. Any window manufacturer that makes inferior products will spend more on service calls and replacing glass and/or windows than they would for testing. Therefore, I would suggest that most manufacturers already make a quality product that would meet the certification standards without the hassle of the certification programs. 3. Anyone that makes a certified window (almost mandatory in today's market) already makes the windows under a monitored, regulated quality control program. I don't believe anything would be added to the product by making manufacturers certify the glass.
8. Strongly Disapprove
9. As the only block mfr in North America, we already use third party agency (ALI). Our "IG" units are actually glass block in the above response to question #3. More correctly, our third party inspects our windows (two products: one with vinyl frame the other with an aluminum clad wood frame), not our glass blocks.
10. If you're justifying your existence merely through costing the work more money, then I don't see a need for your existence.
11. We have our own in-house inspection; we have less than 2% failure on IG units. Bad IG units are very costly. Also, bad units do not help a small company in the sales field. We are very quality minded. We cannot afford to have failed IG until We feel we do a good job in-house. If NFRC chooses to require us to have a third party inspection it would be another costly expense for us, a small business, and for many small businesses.
12. I recommend that we develop the rules and open it up for manufacturers to participate immediately with a mandatory date agreed on by the membership not to exceed two years. Options could be: Durability only; Include gas fill; Include gas retention.

13. I presume that glass type (clear, low e, tempered, laminated, etc) or filling gasses not important to your question about IG models.
14. How can you expect a Canadian/US manufacturer to be required to get certified for the U.S. standards? Remember most of their business is locally in Canada, and as such, they will be very reluctant to spend to the \$\$\$ to certify. Exporting companies like us will be left hanging in the wind..... Will this mean we will have to buy back our S/U's from a U.S. supplier? This is not feasible to buy from the U.S., bring to Canada, the ship back down to the U.S..... I can this - all of our S/U suppliers in Canada are IGMAC certified. Please keep me informed of the process. Cheers!
15. Cost is a big factor. My customers have not requested ICU Certification information, but I would like to offer it.
16. I don't see any issues with this requirement for glass manufacturers. Our current glass suppliers supply glass to a number of shops in the area which are participating with the NFRC.
17. Just another rule to follow and coordination effort that seems endless.
18. I am definitely in favor of the plan.
19. We have quality audits that are done by our glass and spacer people 1-2 times per year. I am NOT in favor of this testing because of the additional cost involved with zero added benefit for the consumer or buyer. Regulation without a benefit is completely unnecessary.
20. This represents substantial change for those manufacturers that might be NFRC Certified, but who may not participate in an IG Certification Program. Provide adequate time for implementation; large manufacturers may require a long implementation time to incorporate the processes needed and turn over inventory.
21. We do not have our IG units certified by a third party because our customer base has not requested it; we have a very low percentage of rejects. Our vendor does a quality inspection every 30 to 45 days with a yearly audit, and the quality systems and training we have for our employees ensures we produce the quality necessary without the extra expense of a third party certification.
22. Small manufacturers are currently struggling with the cost of the current testing. If a third party certification is added at current expenses, it could have terrible ramifications for the small business man to meet the requirements to sell these windows.
23. It is our opinion that IG Certification should remain a voluntary certification program. If the area of concern is loss of thermal performance due to IG unit seal failure, we recommend that the certification prerequisite be limited to gas filled IG units only. It is an unnecessary burden to require IG units with no gas fill to be certified.
24. We would be more supportive if the IG unit certification process used standard production units in lieu of special sample lots with "compromised" spacers.
25. Third party certification is totally unnecessary and is an additional bureaucratic layer. It deviates from NFRC's mission of providing a quantifiable way to compare the thermal performance of various windows. IG certification requires physical testing and cannot be simulated.

Well it may be true that a very poor IG will affect the thermal performance of a window. The real question is the longevity of the IG unit. To my knowledge argon gas retention is not currently measured in the certification program. The only measurement is whether the unit will last through the CBA testing. This is not a particularly demanding test and almost any IG producer can get units to pass for the test. The important issue is consistency of manufacturing process and that is not something that annual certification inspections can assure.

Mandated certification of the IG's will add to the expense of the window products and increase the consumer's cost without providing a meaningful consumer benefit.

26. Our major concerns with third party certification are the high fees associated with the certification process and the details of how the product is tested. We are a small vinyl window manufacturer. Other larger companies can offset the fees due to their high sales volume. Since we manufacture our IG in house for the exclusive use in our vinyl windows, would our IG units be tested installed in our vinyl sash to get true and accurate results on how our IG performs?
27. Don't see how this concerns NFRC's core mission. Durability is a concern of the manufacture in relation to his customer relationship. There are already enough requirements in the NFRC program.
28. We mfr glass blocks only
29. Do not understand why it is needed; window testing should be should be enough.
30. We have over 15,000 different discreet combinations of frame, glazing, spacer, grid, sealant, etc, IG models.

Historically, we have participated in a third party certification program for insulating glass units (IGCC). When we began this participation, our perception was that the marketplace viewed third party certification as a value adding element. A recent review of this program revealed that no value was added in the eyes of our customer base. We demonstrate our commitment to IGU quality every day through periodic laboratory testing and adherence to quality assurance procedures. Our third party organization contracted with the same laboratories that we did for our in house IG quality program, directed that the same tests be conducted at the same frequency, reviewed the same reports, and came to the same conclusions following review. The quality of the product was no different, our commitment to quality was no different, and the perception of our quality by the marketplace was no different. Essentially, the only thing added was cost that our customer base had no interest in bearing. Any future additional costs incurred with participation in yet another third party program will not be absorbed by the marketplace. In the event NFRC mandates a third party IGU program, the costs will certainly be higher that ever before, as those agencies that perform certification services will have a captive customer base. These additional costs will add no value to our product.

31. Bad idea. Just more expense to the cost of the product. Have there been a lot of problems with NFRC manufacturers not standing behind their warranties?
32. We offer three glass types, but one spacer system so I'm confused by the number of models question. We offer dual insulated as well as triple insulated units, with either argon or krypton in those units.
33. Not a very good idea. We are already providing a complete warranty on all IG units.
34. Our spacer system supplier visits our factory two times per year to be sure we are sealing the IG units properly. If we are not using the correct procedures for their spacer system, they would remove it at that time until all problems have been resolved. **We do not need third part to certify our IG units.** It will be very costly to the small manufacturers, possibly putting them out of business so the large IG manufacturers can monopolize the market and set the pricing too high.
35. I am not in favor of adding additional complexity, such as this requirement, to the NFRC program.
36. My only comment is that for relatively small companies such as ours, the costs to meet the various testing and certification programs are substantial. This would probably be an issue for some IG suppliers as well.
37. Bad idea, waste of money for manufacture; should be voluntary.

38. This will have a negative effect on small manufacturers at a time when residential housing construction is very slow.
39. Anything that can be done to reduce the cost of NFRC Certification is a good thing for us. The cost to us per unit sold is much higher than for large manufacturers....
40. Third-party certification is an unnecessary expense; small manufacturers like us may have to drop the NFRC program if they are required.
41. Certification of IG units is currently required for AAMA certification, so our windows currently meet third party certification. Use of AAMA or other organizations' requirements should ensure that IG certification requirements are being met. Requirement for third party certification is a good idea as long as it does not require two separate certifications. I believe that your intent would allow use of AAMA product certification as verification that the IG units have been certified by a third party.
42. We are currently in the process of certifying our IGU with IGMA.