

NFRC 200 Applied Films Ballot [\(click here to access the original proposed ballot\)](#)



Legend:

AC :Approve with Comment

NEG: Negative response with Comments

**NFRC Ballot Comments through November 2, 2009
Technical Committee – Solar Heat Gain Subcommittee**

Company Name, Rep Initials	AC/ NEG	Section and/or Page #	Comment/Alternate Language
Cardinal IG, JL	NEG	Tables 5.2 and 5.3	Tables 5.2 and 5.3 include window combinations that do not exist in the default tables from the model energy code. To eliminate confusion on how to use these tables, the cleanest remedy would be to make films a stand alone document similar to attachments or add a disclaimer stating that ratings per 2.1 K are not code complaint.
Andersen Corp, SJ	NEG		Interior applied films are actually an attachment product; and should be addressed in standalone attachment product documents. Also, why retain residential and non-residential classifications? Those classifications were eliminated some time ago in the existing window rating program. How will the consumer know whether the film is being applied to a residential or a commercial window, especially in retro-fit applications? There is no indicator on the window.
Alliance to Save Energy, NP	NEG		I recommend a different set of reference windows for two reasons: 1) ensure that U-factor results from NFRC 100 are conservative and 2) simplify the rating by reducing the number of reference windows from six to four. See attached comments. See comments below.
LBNL, SS	APC	Tables 5-3 and 5-4	Missing units in Table 5-3 and 5-4
Hunter Douglas, MC	APC		references to “combination fenestration attachment products” in the NFRC 200 document should be consistent with other applied films language in order to differentiate Applied Films from other Fenestration Attachment products
WESTLab, JB	APC		I still do not like the multiple glass ratings in this procedure. It will lead to confusion on the label. A simpler rating to truly compare films would be better.
Marvin Windows and Doors, JK	APC		Please explain why the reference product is being limited to fixed aluminum only.

NFRC 200 Applied Films Ballot

Negative by Nils Petermann, Alliance to Save Energy

In my negative to the NFRC 100 Applied Films ballot, I propose limiting the reference product categories to these four types:

- Single pane, metal frame
- Single pane, non-metal frame
- Double pane, metal frame
- Double pane, non-metal frame

These four reference window types are already contained in NFRC 200.

For the SHGC, it is conservative to use fixed reference windows, so I do not propose any change to the operator type in this ballot even though my negative to the NFRC 100 Applied Films ballot proposes operable windows in the case of metal-framed reference products to ensure conservative U-factor ratings.