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January 6, 2011

The Honorable Darrell Issa
House of Representatives
2157 Rayburn House Office Building
Washington DC 20515

Dear Congressman Issa,

On behalf of America's architectural glass fabrication and installation firms, window and door dealers, and auto glass replacement and repair firms, we applaud you for your initiative in examining existing and proposed regulations that may have an adverse impact on job growth.

In response to your December 29th request, our industry can identify several regulations that are in need of change. One in particular, however, is causing considerable adverse consequences to our members' revenue and job growth – namely the Environmental Protection Agency (EPA) Renovation, Repair and Painting (RRP) Program, which applies to residential properties built prior to 1978.

Unfortunately, the EPA is now poised to add another onerous mandate to this program in July, 2011: the Lead Clearance and Testing Requirements rule. To aggravate the matter even further, the EPA is expected to apply the entire program to commercial glazing and construction.

It is our view that the proposed lead clearance testing and third-party validation amendment to the lead paint regulations (which took effect on July 6, 2010) goes too far; is causing substantial harm to the vast majority of our nation's window and door dealers; and, is poised to inflict similar harm on commercial glazing and construction companies as well.

We recently surveyed the window and door industry to gauge the impact of the new lead paint rules and to seek input on EPA's latest proposal. Respondents provided a wealth of feedback – overwhelmingly negative – about the new rules, ranging from substantial increases in both hard and soft costs (averaging about \$750 per job, far above EPA's own original estimate of a \$250 incremental increase), to anecdotal accounts of lost business and other serious repercussions resulting directly from the rule.

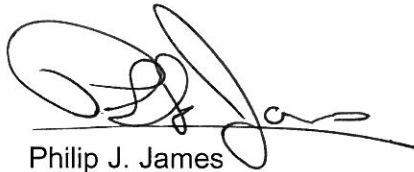
We have documented our concerns associated with the existing lead paint rule, and the projected deleterious effects of the new proposals, directly with the Obama Administration. We implored the EPA to either eliminate the RRP program altogether or, at a minimum, defer its implementation until sufficient data can be collected and analyzed to determine whether or not the new requirements are cost-effective. Our pleas have fallen on deaf ears.

I have attached some of the documents we presented to the EPA and the White House Office of Information and Regulatory Affairs (OIRA) on this issue. If it is appropriate, we can also supply

copies of the many real-world illustrations of harm done by the regulations, which we presented to the EPA staff last year.

While we understand that EPA's lead paint rules were designed to address a defined health concern with respect to lead poisoning abatement, both the rule's broad application and its lack of flexibility have generated unintended consequences that are costing jobs, harming our industry and, by extension, hurting the nation's economic recovery. Several other options, as reported in the Federal Register, were suggested by EPA, which would have safeguarded the public while maintaining job growth. Regrettably, the EPA chose the least practical path for all concerned.

We would be happy to discuss our concerns in more depth with you or your staff at any time. Thank you for your leadership on this issue, and on behalf of our country.

A handwritten signature in black ink, appearing to read 'Philip J. James', written over a horizontal line.

Philip J. James

President & CEO

National Glass Association and Window and Door Dealers Alliance