



June 19, 2007

## **AAMA, AEC, GANA, IGMA Unite to Address NFRC Component Modeling Approach**

The American Architectural Manufacturers Association (AAMA), Aluminum Extruders Council (AEC), Glass Association of North America (GANA) and Insulating Glass Manufacturers Alliance (IGMA) are making every effort to work within the National Fenestration Rating Council (NFRC) process to address what they have collectively and repeatedly stated as being the ongoing issues relative to the Component Modeling Approach (CMA). These issues center primarily around the proposed fee structure as well as the fact that the nature of the highly customized segment of the commercial market, specifically unit curtain wall, is not conducive to the CMA Program as currently presented.

These four industry organizations have discussed the recent proposed fee structure and CMA certification program with their respective members, whom collectively represent the majority of the product manufacturers serving the commercial market. In joint response, AAMA, AEC, GANA, and IGMA are in agreement on the following points:

- There is broad consensus that the proposed fee structure is not conducive to the CMA program being widely used and successful.
- The program needs a fundamental change (not just minor tweaks) to make the program viable.
- NFRC should consider several possible fundamental changes to the program. These include:
  1. Working with AAMA and other industry groups on a joint commercial rating standard, such as AAMA 507, which would meet the needs of all parties involved.
  2. Reducing the scope of the program to first establish the rating procedures only, followed by the certification program later.
  3. Focusing the program on only one target market segment (such as storefront and low-rise commercial), and not apply the program to other segments that are typically already using high-performance custom curtain / window wall systems.
- We believe the program will only be successful if all of the program development costs are covered through outside funding (government, utilities, etc.) in order to reduce fees and increase industry participation.
- It remains difficult to gauge acceptance of the program without knowing the full costs, including the effect of frame and spacer grouping, simulation fees, validation testing costs, ACE fees, and IA fees.

It is unclear at this time how NFRC plans to proceed, but all four organizations have been invited to solicit their respective memberships for volunteers to participate as "subject matter experts" related to custom

architectural products in a CMA project management evaluation process designed by the consulting firm hired by NFRC to oversee development and implementation of this program. Additionally, all four organizations remain committed to working toward a solution that meets the needs of both the industry and the public.

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