

October 25, 2002

Darcy Hoffmeyer
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Subject: Energy Star Draft Version 3.0

Dear Ms. Hoffmeyer:

Thank you for the opportunity to comment on the subject proposal. We believe the Energy Star Program is effective in getting good, energy-efficient products into the marketplace and wish to provide any assistance that we can. We strongly support the continued efforts to promote energy efficient products but not at the expense of reduced performance.

We can not help but look at the website to see what comments and proposals you are receiving, and we are appalled to see some of the proposals for reducing exit sign visibility requirements to those specified in UL 924. We have done everything we can to encourage UL to keep exit sign visibility at 100 ft equal to an externally illuminated sign with 5 fc on its face. Instead, UL has reduced the requirement to allow a sign that is barely legible at 50 ft after the observer's eyes have been allowed to adapt to total darkness for 5 minutes. UL had done this without due regard to our argument that research proves the first few minutes are critical in evacuating a building safely. We are glad to see that the subject proposal does a good job of maintaining the integrity of the Energy Star program.

We have these specific comments on the proposals:

Definitions

We believe the illuminating source must be provided with the exit sign, and it must be connected to an unswitched source of power. When the illuminating source is to be provided by the building lighting, in too many cases, the AHJ is not able to ensure that the proper lighting is being used and that the lighting is provided any time the building is occupied.

Input Power Demand

We believe the proposed change to 3 watts per sign is too low to allow proper design. While it is possible to design an exit to meet this very stringent specification, it forces compromises in good design for long life. A more appropriate specification would be 5 watts per sign which will allow operating LED light sources within reasonable parameters to ensure sufficient light output while maintaining long life. This is a 50 % reduction from the present requirements.

Light Source Degradation

We do not object to informing the user that the light source will depreciate. We suggest the following wording which is a slight tweaking of your wording: "The light source in this exit sign will depreciate, which can lead to a light output level that is below current building code requirements. The light source (lamps) should be replaced at regular intervals, and when they are no longer functioning, to assure safety and visibility in the event of an emergency." This statement must appear in the product materials. This is a perfectly good statement, and it should be standard. Allowing other statements to be approved by EPA will simply introduce additional complexity in this age of marketing in a very competitive environment. Changing the wording

“...in the user manual or installation instructions.” to “... in the product materials.” allows more flexibility in providing this marking.

Power Factor

We strongly agree with your present requirement that power factor should be a leading power factor, or a lagging power factor not less than 0.7. This is desirable because, in general, billing for electricity is based on kilowatt-hours used. While realizing penalties can be incurred when a very low power factor is involved, most commercial and industrial buildings have a lagging power factor. Exit signs with capacitive input have a leading power factor which tends to help compensate for lagging power factor and makes the total building power factor closer to unity where there is no penalty. Since exit signs use such a small percentage of the total building electricity, there is no need to limit leading power factor.

Effective Date – January 1, 2002

This is not an acceptable date since the final requirements have not been established. Until then, it is not possible to determine how much work or time will be needed to establish compliance. Also, we have not seen the new form for submitting products and therefore do not know how much work this will entail. We suggest an effective date of one year from the publication date of the final requirements and submittal form.

Thank you for the opportunity to provide comments and suggestions for this very important document.

Sincerely,

Billy G. Helton
Manager, Engineering Services