



## **Comments on 4/9/07 Draft ENERGY STAR Requirements for SSL Luminaires**

American Lighting Association\*

The American Lighting Association (ALA) appreciates this opportunity to comment during this second review of the proposed Version 1.0 of the Draft. Progress has been made and we are pleased to see that several of the concerns we listed in our comments of 2/8/07 at the Stakeholders Meeting have been addressed.

### **Scope (Page 3)**

It is now clear that some residential/decorative luminaires are to be included. The distinction, however, between decorative luminaires to be included and decorative luminaires not to be included is based upon the phrase, "so long as those luminaires provide a significant general illumination function". This is not a distinction that the industry can control as even decorative luminaires, perhaps designed by the manufacturer only for appearance, may have a general illumination function such as a night light once they are put to use by a consumer. We feel a clearer distinction is needed and would be pleased to assist with that effort.

### **Comment on Future Glare Requirement (Page 12)**

The ALA remains concerned that focusing on fixture efficacy which, of course, can be measured and compared in numerical terms, will lead to fixtures which compromise and denigrate appearance and aesthetics. These are key sales factors to customers of residential/decorative luminaires but they cannot be measured in numerical terms.

For example, glare control, as a lighting quality factor, is also important to consumers and we agree that it must be taken into account. However, the glare metrics listed on Page 12 (such as VCP and UGR) cannot do that. Those metrics were developed for ceiling-mounted fluorescent lighting systems arranged to provide uniform illumination. The metrics are not defined and cannot give

accurate results for situations such as single fixtures in a residential environment. Unfortunately, we know of no existing glare metric that can.

A way must be found to assign some value to glare and the non-numerical factors which are important to consumer acceptance, product sales and the viability of the residential/decorative luminaire business.

The ALA understands how important fixture efficacy is to the DOE in making sure that solid state light sources are selected and operated properly to reduce lighting energy use. However, the draft as written will limit the ability of the residential/decorative luminaire industry to design and sell fixtures which use high-efficacy SSL sources, but which, because of decorative or aesthetic elements, do not meet the narrowly-defined DOE fixture efficacy limits.

In other words, the DOE fixture efficacy approach will lead to a limited number of fixture design options in a market where the customer is demanding more options. Decorative or aesthetic variations which optically change light output, distribution or direction will disqualify the luminaire even though the light source is operating at high efficacy.

#### **Determination of Input Power (Page13)**

There was discussion after the initial draft about how to determine luminaire input power where the driver circuitry is powered by transformers which may also power additional drivers. This question remains.

#### **Qualification Process (Page 16)**

It is good to see that an effort is to be made to simplify luminaire testing and reduce testing costs. We also appreciate the change that allows grouping of similar products for testing purposes. The costs of distribution photometry where absolute lumen measurements are required remains, however, a substantial financial burden for manufacturers making low-cost consumer products and we feel that this will severely limit manufacturer participation until costs are reduced.

#### **In General**

As indicated previously, the ALA is concerned about the overlap and administrative complexity of two Energy Star Fixture Programs. These programs have one name and common goals. We renew our request to have the DOE and the EPA to work together to help establish a single program and "portal" for testing, submission of information and inquiries.

The ALA remains supportive of the Energy Star Lighting Program and the goal to substantially reduce lighting energy use.

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