

Dear Mr. Fanara:

Thank you for the opportunity to comment on your October 7, 2002 proposal. I fully support EPA's mission as a voluntary labeling program designed to identify and promote energy-efficient products in order to reduce carbon dioxide emissions.

However, EPA's Exit Sign Draft 1 Version 3.0 goes well beyond the scope of the program. If EPA, or any other branch of federal government, feels the minimum safety requirements for exit signs established by the various model building code and test standards organizations, such as the National Fire Protection Association (NFPA), the International Code Congress (ICC, ICBO, BOCA, SBCCI), and Underwriters Laboratories are inadequate, then it should participate in changing those safety standards through the model code process and not through an Energy Star program.

Each year, thousands of building officials, fire officials and industry experts from all over the country review existing and proposed building code requirements and standards to insure that the public is provided with an acceptable minimum level of fire and panic safety. These model building codes are then further reviewed by states and local jurisdictions and are adopted and enforced by the building and fire officials of each state. It is because of this national process involving thousands of building officials, fire officials and industry experts that these model building codes and standards are considered to be **national consensus**

For this reason, I implore EPA to defer to these national codes and standards and not attempt to write your own fire and panic safety standards. If EPA feels compelled to change the safety standards for exit signs, then it should do so by participating in the national model code and standards making process so that building officials, fire officials and industry experts from throughout the country can hear the arguments and come to a consensus.

Accordingly

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