Dear Ms. Hoffmeyer,

I would like to offer one comment on the proposed product specifications. I believe the requirement for a power factor of not less than 0.7 is not to the best interest of ENERGY STAR.

The highest energy efficiency in exit signs is typically obtained by the use of power supply circuits that inherently produce low power factors. These may be capacitive ballasts which produce very low leading power factors but extremely high energy efficiency; or lightly loaded transformers which produce low lagging power factors but again high energy efficiency.

Since the total energy used by exit signs in a typical installation is small compared with the major energy use, average power factor of the installation is still generally high, as dictated by the major energy users. I therefore believe that the requirement of 3 watts or less per sign is more meaningful to the objectives of ENERGY STAR, and should not be compromised by limiting the power factor.

Sincerely,

Bob Flieder