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23 August 2002

Darcy Hoffmeyer
ICF Consulting
1850 K Street NW
Suite 1000
Washington, DC 20006

Dear Ms. Hoffmeyer;

Isolite Corporation, a manufacturer of emergency lighting products, has been a participant in the *Energy Star Exit Sign Program* since February, 1997. Our design, manufacturing and marketing focus is to provide customers with the most energy efficient products available. We market both electrical LED and non-electrical self-luminous exit signs.

We believe that the EPA has gone far beyond the scope of its mandate "to identify and promote energy-efficient products in order to reduce carbon dioxide emissions" by establishing performance criterion for exit signs that are unrelated to energy efficiency.

While the Memorandum of Understanding between the U.S. EPA and the Manufacturer appropriately defines criterion for a products' energy consumption, Energy Star specifications should NOT take responsibility for creating performance characteristics which are unrelated to energy consumption. Such methodology is inconsistent with other Energy Star Programs.

The *Energy Star Residential Light Fixture Program* specifically quantifies three performance categories for light fixtures: *input power*, *power factor* and *efficacy*. You will note that these are energy-efficiency characteristics only.

All other performance characteristics of the Residential Light Fixture category incorporate, by reference, the appropriate Nationally Recognized Standards of the NFPA, ANSI, UL, IENSA and CIE. The same protocol should apply to the exit sign category.

While we support the intent of the Energy Star Program, we continue to take exception to the performance characteristics for exit signs and would like to see the following items incorporated into the energy star specification for exit signs.

1. Incorporate by reference, performance requirements of the most current version of UL924 Standard for Emergency Lighting and Power Equipment.

    a. This would assure that an Energy Star listed sign is suitable for installation according to NFPA Life Safety Code 101 and to all model building codes.

    b. This would ensure a measure of inherent quality in the labeled product and allow for continued improvements of the standard to be realized by Energy Star consumers.

    c. This would allow manufacturers to test to "Energy Star" specifications and allow verification of the Energy Star label.

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2. Recognize that Self-Luminous exit signs are most closely aligned with the Energy Star's charge "to identify and promote energy-efficient products in order to reduce carbon dioxide emissions" and consequently allow them to carry the "Energy Star" Label

    a. Self-Luminous consume no electricity and consequently do not contribute to increased greenhouse gas emissions

    b. Self-luminous signs are tested and listed to the same 100' viewing distance as electrical exit signs, however, self-luminous exit signs cannot meet the current luminance requirement of the Energy Star Exit Sign Specification

       Luminance ≠ Legibility; a brighter sign does not equate to a sign with greater legibility. In addition to luminance, size, shape, wavelength of light emission, viewing distance and the human eye response all affect legibility.

    c. Self-Luminous signs are approved for use in all code occupancies that require illuminated egress marking, including:

        1. Life Safety Code (ANSI/NFPA-101)
        2. NEC (ANSI/NFPA-70)
        3. OSHA
        4. DoDI – Department of Defense Instruction
        5. BOCA National Building Code
        6. ICBO Uniform Building Code
        7. SBCCI Standard Building Code
        8. ICC International Building Code

3. Directly specify only the Energy Efficiency Characteristics of an exit sign

    a. All other characteristics are not directly related to energy consumption

Due to the anomalous performance requirements of the current Energy Star Exit Sign Program, the most energy efficient exit sign category has been excluded from participation in the program: self-luminous exit signs. The Energy Star Exit Sign Program should embrace technologies which support its direction.

For more than 40 years, self-luminous exit signs have been providing the most energy efficient solution for marking means of egress. Schools and universities, hospitals, restaurants, office buildings, aircraft, industrial facilities, and many government buildings including, The White House, rely upon this established and proven technology.

The Energy Star Program for Exit Signs simply must be amended to allow for the inclusion of self-luminous exit signs.

Please feel free to contact me as necessary.

Sincerely,

Bill Rowan