

August 29, 2002

ICF Consulting
1850 K Street NW – Ste. 1000
Washington, DC 20006

Attention: Ms. Darcy Hoffmeyer

Dear Darcy:

During our past meetings we have discussed that the current Key Product Criteria for Exit Signs does not address or allow new technologies into the program even though they meet current Commercial/Industrial Standards and Building Codes. UL has addressed this issue on July 11, 2001 with the SG Supplement and there have been several manufacturers that have been tested and listed to this standard. All of the current building codes have been met with currently listed Photoluminescent Exit Signs (see attached ICBO Report). NFPA Life Safety Code 101 addressed this issue in the 2000 Edition by saying that Photoluminescent Exit Signs must be listed to UL 924 (Page 227, Section A.7.10.7.2).

UL 924 has been the domestic commercial/industrial standard for emergency lighting and power equipment. This is currently in its eighth edition and is seeking ANSI status. I believe it would be prudent for Energy Star to remove itself from the standards writing business and adopt accepted commercial/industrial standards. As we speak, Canada is reviewing the UL 924 standard for adoption in Canada. This will make UL 924 not just a domestically accepted standard but truly an internationally accepted one.

The maximum efficiency issue also needs to be adjusted based on currently available technology. The DOE has stated that current electroluminescent and LED products are available that use (1) one watt or less and that photoluminescent exit signs require (0) ZERO electrical energy input. Based on products that are available today, (5) five watts of input power demand is too high.

It has been posted on the Energy Star web site that the U.S. currently spends \$1 billion for energy on electric exit signs that operate 24/7/365. And that with the adoption of LED signs that we could save \$70 million. With Photoluminescent Exit Signs we could potentially save the U.S. economy \$1 BILLION.

We would recommend that Energy Star adopt the UL 924 Standard for Emergency Lighting and Power Equipment as the Key Product Criteria Standard for Exit Signs, stating that they must be listed to this standard with a maximum Input Power Demand of (1) one watt or less per face.

Thank you for the opportunity to express our recommendations.

Sincerely,

JESSUP MANUFACTURING COMPANY

Alan M. Carlson
V.P. Marketing/New Product Development

AMC/mh
Enclosures