

April 28, 2003

Andrew Fanara
EPA Program Manager
ENERGY STAR for Exit Signs
United States EPA
1200 Pennsylvania Ave., NW
MC 6202J
Washington, DC 20460

Subject: ENERGY STAR Program Requirements for Exit Signs
Draft 2-Eligibility Criteria – Version 3.0

Dear Mr. Fanara:

It is my understanding that you are allowing comments to documents that have been posted on the Energy Star website. We would like to take this opportunity to comment on two of the comments submitted by Manny Muniz Associates, LLC regarding the comments submitted by Lithonia.

Minimum Luminance Requirements

The previous version of Energy Star Program Requirements for Exit Signs specified a minimum luminance of 8.6 cd/m². The subject version has dropped this minimum luminance requirement, and simply requires the sign to comply with UL 924. We are objecting to EPA dropping the 8.6 cd/m². We do not attempt to interpret UL 924 because that is best left to UL.

Observer Requirements

The mention of 24/40 visual acuity is clearly a typographical error that slipped through. There was no attempt to dispute the fact that 20/40 is published in UL 924, Sec. 40.1.2(a). However, the adequacy of this requirement is being questioned.

Sincerely,

Billy G. Helton
Manager, Engineering Services

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