

Thank you for the opportunity to comment on the proposals for the Energy Star Exit Sign Draft 1 Version 3.0. I am the fire protection consultant to eight (8) manufacturers of exit signs. I am a retired state fire safety regulator and am currently a member of the UL 924, Emergency Lighting and Power Equipment Standards Technical Panel.

Let me begin by saying that 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 to promote energy-efficient products. The proposal would essentially establish a new federal minimum safety standard for exit signs above and beyond what has been established by the various model building codes and the individual states.

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 or test standards 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 codes. Indeed, many of these codes, such as the NFPA codes, are ANSI approved standards.

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

Accordingly, I am requesting that EPA modify and limit the Energy Star Exit Sign Draft 1 Version 3.0 proposal to the Energy Efficiency Characteristics of exit signs. That is what EPA does best.

Let the National Fire Protection Association (NFPA), the International Code Congress (International Conference of Building Officials ICBO, Building Officials and Code Administrators International BOCA, Southern Building Code Congress International SBCCI), and Underwriters Laboratories (UL) do what they do best.

Thank you for your consideration.

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