

Thomas & Betts Corporation  
8155 T&B Boulevard  
Memphis, Tennessee 38125  
(901) 252-5000

***Thomas&Betts***

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Darcy Hoffmeyer  
ICF Consulting  
Energy Efficiency Programs  
1850 K Street, NW \* Suite 1000 \* Washington, DC 20006

Subject : Changes to Exit Sign Requirements

1. Change from 5 watts/face to 5 watts /sign.
2. Addition of Power factor with requirements of .8 Lag and no restrictions on Lead.
3. Establish a max. input power to 40 VA.
4. We oppose the inclusion of photoluminescent type, non-electrical signs. These sign types rely on an external lighting source(s) and actual energy usage is difficult to manage.
5. We oppose the inclusion of a "Mean Time between Failure, MTBF" statement.
6. We have supported the NEMA effort for the collection of data for Energy Star product sales as an association. We believe this will provide better, more timely data.
7. Although the prohibition of edge-lit signs was removed in the last update, the definition of an exit sign still includes the phrase, " and the background of an exit sign is not transparent". This permits colored backgrounds, but not the popular red lettering on clear background style.

If additional information is needed, please do not hesitate to contact me.

Sincerely,

Greg Steinman  
Technical Liaison Engineer  
Fax 901 252-1333  
e-mail greg\_steinman@tnb.com