



sea gull lighting®

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October 20, 2008

Alex Baker
ENERGY STAR Lighting Program Manager
US EPA

Dear Mr. Baker,

On behalf of Sea Gull Lighting, please accept the following comments on EPA's proposed ENERGY STAR Residential Lighting Fixture V4.2 proposal, dated September 22, 2008.

EPA Proposal: Limit qualified LED light engine CCT values to 2700, 3000, and 3500 Kelvin for indoor fixtures.

Response: ENERGY STAR should not limit color temperature options. Although the majority of residential lighting does utilize 2700 and 3000 Kelvin light sources, there is a demand for higher color temperature sources in the home. This is evident in the growing number of higher color temperature (> 3,500K) lamps purchased by consumers, and the growing interest in higher color temperatures for the aging population. After all, color temperature is and should be a personal preference.

EPA Proposal: Set minimum light output requirements for fixtures qualified using LED light engines.

Response: Minimum lumen requirements are necessary, especially in the new LED market where so many products produce unsatisfactory light levels. However, ENERGY STAR should consider a lower lumen requirement of 300 to 350lm to accommodate lower light level requirements already seen in some of today's residential lighting fixtures. This is especially true in a multi-light chandelier where five or more bulbs at 475 lumens each can easily produce "too" much light. Although dimming can be an option to achieve the right light level, for LEDs it is more expensive to purchase a dimmable driver, plus the homeowner needs to purchase a low-voltage dimmer which is several times more expensive than a standard dimmer.

EPA Request: Input for communication information about color temperatures.

Response: It is more important than ever that industry and government educate consumers about Color Temperature. Given that consumers already use the terms warm-white, cool-white, day-light to describe bulb "colors," it is important that ENERGY STAR use these highly recognized names as a basis, and then build a description around these terms. "Color charts" showing the relative appearance of the warm and cool temperatures could be placed on or in product packaging.

Thank you for your consideration of these comments.

Sincerely,

Paul Vrabel, LC, PMP
Director, Energy Efficient Products
Sea Gull Lighting