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To: SSL

Subject: Doe Energy Star

To whom it may concern:

We saw that the DOE Energy Star Program get released to the Stakeholders on July 1st, 2009, and it included the Fitted Target Efficacy. I am still worried that we're not looking at this completely right. My fear is based on assumptions that we will be going back to obtrusive glare that can create a safety hazard and poor uniformity that will require more product to satisfy the task minimum requirements.

The ultimate goal should be shorter poles and better product to place light on the target and doesn't put light toward wasted zones. The assumptions used on the BUG ratings are deceptive because it assumes that light above 60-deg is a glare zone when in fact it isn't. HID lighting has had the 60 to 70 zone as the ultimate lighting zone for area lighting for many years and if LED has to be a lower angle, then more poles will be required to light the same task.

If we really are trying to stop light above 60-deg, then we might want to consider relating it to Footlamberts. The HID main intensity at its peak is typically a tighter Iso-candela trace whereas LEDs tend to have a spread area at the main peak due to the cluster of diodes in relation to the optical assembly. The eye is less distracted by the LEDs (unless they are high Kelvin) than by the HID because the intensity isn't as bright as compared to the dark sky behind the fixture.

I just want to express my concern and hope that we can truly create a standard that allows for good quality of light for safety and public concerns as well as to save energy by putting the light where it is intended. With the proposed standards as received on July 1st, Kim Lighting will be hurt by the assumptions and lose potential business from those that seek the initiative rebates that the government is imposing. These concerns go into all aspects of outdoor lighting where safety must be our primary concern, so when the requirements for parking garage lighting is recommending 70 Luminaire Lumens per watt, I cringe at the idea that glary bright LEDs will distract drivers as they pass by people walking toward shopping centers and entertainments facilities.

For what is it worth? Thanks for all you have done so far, you are on the right track.

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