



May 12, 2017

VIA EMAIL

Abigail Daken
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
MC 6202A
Washington, DC 20460
ceilingfans@energystar.gov

RE: Comments of the American Lighting Association on the U.S. Environmental Protection Agency's Draft 1 Version 4.0 ENERGY STAR® Residential Ceiling Fans specification

Dear Ms. Daken:

The American Lighting Association (ALA) represents over three thousand members in the residential lighting, ceiling fan and controls industries in the United States, Canada and the Caribbean. Our member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers that have the expertise to educate and serve their customers. The membership of ALA includes 19 manufacturers of ceiling fans or ceiling fan light kits (CFLK) and nearly 975 retail showrooms that sell ceiling fans or CFLKs.

ALA appreciates the opportunity to submit these comments on Draft 1 Version 4.0 ENERGY STAR® Residential Ceiling Fans specification (April 14, 2017)¹. These comments are submitted on behalf of a group of ALA members and other interested parties² that would be directly impacted by the specification – companies that manufacture, import, distribute, and retail ceiling fans in U.S.

¹ https://www.energystar.gov/products/spec/ceiling_fans_specification_version_4_0_pd

² Specifically, ALA submits these comments on behalf of the following entities: Canarm Ltd.; Casablanca Fan Company/Hunter Fan Co.; Emerson Ceiling Fans; Fanimation; Feiss - Monte Carlo; HKC, US; Kendal Lighting Inc.; Kichler Lighting; Litex Industries Limited/Ellington Fans/Craftmade; Luminance; Lutron Electronics, Inc. Matthews Fan Company & WPT Design; Minka Group; Pacific Coast Lighting, Inc./Lamps Plus; Progress Lighting, a Division of Hubbell; Quorum International; Regency Ceiling Fans; Savoy House Lighting; The Modern Fan Co.; Vaxcel International; and Westinghouse Lighting.

1 DEFINITIONS

V. Standby Mode Power

ALA believes the definition of this term should define “Standby Mode”, not “Standby Mode Power” as written.

2 SCOPE

2.1 Included Products

The title of the specification should reflect the scope change to include CFLKs. This is important as CFLKs can be sold (and certified) separately. ALA recommends changing the title to: “ENERGY STAR® Program Requirements Product Specification for Residential Ceiling Fans and Ceiling Fan Light Kits”.

3 CERTIFICATION CRITERIA

3.1 Ceiling Fan Requirements

Overall, ALA supports the proposed airflow efficiency requirements.

3.2 Ceiling Fan Light Kit Requirements

ALA member fan manufacturers support the proposal to incorporate the lighting requirements for ceiling fan light kits in the ceiling fan specification. ALA also supports the proposal including multiple options for certifying lighting products, allowing manufacturers to utilize various methods such as including Energy Star certified lamps, light engines with separable light sources ANSI base types, or integrated solid state light sources, will provide the design flexibility needed to develop products that meet multiple consumer requirements.

3.2.3 Option 2 Performance Requirements – Flicker and NEMA 77

With the growth in solid state lighting (LED) light sources ALA members appreciate Environmental Protection Agency’s (EPA) desire to prevent potential consumer dissatisfaction resulting from flicker.

NEMA and lighting manufacturers directly involved in the development of NEMA-77 may be better suited to provide EPA guidance on the applicability of the new standard and we will request additional comments from NEMA on this proposal.

ALA generally supports the use of industry test procedures wherever needed but would note for your consideration that, as a normal part of the product development process, fan manufacturers consider multiple possible lighting configurations before deciding on a final design in order to meet specific style and consumer preference requirements. During this process any features which might negatively impact the overall consumer experience, such as flicker or other unacceptable stroboscopic effects, are eliminated as a normal part of the design process and therefore requiring additional testing requirements or limits may not be required.

As the test method was developed for all SSL lighting loads and flicker is possible in dimmed and non-dim LED lamps, ALA recommends having the flicker standard apply to all CFLKs.

ALA suggests modifying Table 3 as follows.

ENERGY STAR REQUIREMENT	REQUIREMENT	<u>METHOD OF MEASUREMENT</u>
<p>Dimmability: This applies to any CFLK marketed as dimmable; if not marketed as dimmable, packaging and marketing materials must identify that the CFLK is “not dimmable”</p>	<p>A dimmable CFLK shall provide continuous dimming from 100% to 20% of light output. Exception: Step dimming CFLKs</p> <p>At minimum claimed light output, CFLK shall not emit noise above 24dBA when measured at a distance of one meter or less.</p> <p>See packaging section for related marking requirements.</p> <p>A dimmable SSL CFLK shall meet NEMA SSL 7A for compatibility.</p>	<p><u>Methods of Measurement:</u> NEMA SSL7A ENERGY STAR Recommended Practice - Light Output on a Dimmer ENERGY STAR Test Method - Noise</p> <p><u>Reference Documents:</u> ISO 7574-4:1985, B.2.1 ANSI S12.55-2012/ISO3745:2012</p>
<p>Flicker</p>	<p>CFLKs shall meet NEMA 77-2017 for temporal light modulation limits.</p>	<p>NEMA 77-2017</p>

4 CONTROL AND STANDBY REQUIREMENTS

4.1 Wired and Remote Controls

Traditional hard-wired fan-speed controls have almost universal compatibility with ceiling fans using AC motors, but are not compatible with fans with DC motors. Controls for fans with DC motors are typically unique to a specific fan or line of fans.

ALA members will submit company specific comments regarding the hard-wired control requirements.

4.2.1 Connected Product Criteria

ALA supports the approach of harmonizing the requirements for Connected Functionality with those in Luminaires 2.0. Connected functionality is most useful when implemented across multiple product categories, and therefore it is key for EPA to offer consistent requirements/interpretations.

4.3 Standby Power Consumption

ALA supports having standby power as a reported requirement.

5 MINIMUM WARRANTY

ALA appreciates the intent and spirit of EPA’s proposal for a 10-year warranty on the motor and the motor electronics, however, ALA believes this to be unrealistic and an unfair burden.

Several challenges exist that make complying with a 10-year warranty for motor electronics unrealistic, such as access to available parts inventory. This is due to the rapidly changing nature of advances in componentry. Ultimately manufacturers would need to be prepared to replace the entire ceiling fan with a comparable model in order to fulfill a 10-year warranty requirement on

the motor electronics. The cost of ENERGY STAR® rated fans would significantly increase for consumers.

This proposed 10-year warranty for motor electronics is troubling especially when compared to the substantial majority of ENERGY STAR® product categories that do not have specifications for warranty requirements. In fact, clothes washers utilize similar motor technology (BLDC motors) and electronics to that of ceiling fans, but they are not required to warranty the motor or electronics.

CONCLUSION

ALA appreciates EPA's consideration of these comments and looks forward to working through the process.

Respectfully Submitted,



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