



September 19, 2016

Ms. Abigail Daken  
US Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington DC, 20460

Ms. Daken,

Delta T Corporation, dba Big Ass Solutions, thanks the Environmental Protection Agency for taking appropriate steps to begin the process of aligning Energy Star testing for Ceiling Fan Light Kits (CFLKs) with the new test procedures implemented by the Department of Energy. Specifically, BAS appreciates EPA's exemption of standby power for luminaries in this proposal. As standby power is assigned to the ceiling fan under the new DOE ceiling fan test procedure, BAS feels this is the appropriate course of action so standby power is not accounted for twice when testing a ceiling fan with a CFLK.

Conversely, BAS has concerns that while the DOE CFLK test procedure allows for the manufacturer to remove any removable cover the EPA proposal does not grant this option. While BAS acknowledges that EPA may have selected the minimum efficiency for qualification with the requirement to maintain the installation of the cover in mind, BAS feels it would be more appropriate to mirror the DOE method of test and to increase the minimum efficiency if necessary. Requiring a cover in one method of test but allowing for its removal in another may create conflicting requirements and lead to confusion with regards to the efficiency of the CFLK.

Please do not hesitate to contact me with questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Patrick Keal".

Patrick Keal  
Government Affairs Director