

Monday, June 07, 2010

**Comments - ENERGY STAR® Program Requirements for Luminaires Eligibility
Criteria – Version 1.0, DRAFT 1**

Comment One:

In order to compete fairly (in a price comparison with incandescent fixtures) and to allow our customers to use a broad choice of qualified Energy Star lamps, (with our Energy Star fixtures), we would like to have the option to sell Energy Star fixtures without lamps, but provide qualified Energy Star lamps for sale to our customers as an optional item.

To coordinate this option with your existing requirements, we suggest that the Energy Star program requirements should allow manufacturers two lamp shipment options, manufacturers can either:

- 1- Continue to ship qualified decorative lighting fixtures with lamps included in the packages as per the requirements of Energy Star Version 4.2 or
- 2- Manufacturers can ship decorative lighting fixtures without lamps if they:
 - (a)- distinctly label the fixture package stating that the required lamp is not included in the package
 - (b)- list the qualified Energy Star lamp(s) type suggested for, and/or compatible with this fixture on the package, and in the instruction sheet (Using the ANSI/ NEMA generic lamp description and the manufacturers sku's numbers to identify these lamps.)
 - (c)- Require that the suggested lamp type be available, in stock, from the manufacturer, while the qualified Energy Star fixture is being sold.

Comment Two:

For fixtures that will have Luminous Fixture Efficacy Requirements, Under the heading "*Directional Luminaires Residential: Fluorescent and Solid State Sources Only*". There is a category that includes "*Outdoor Post- or Arm-Mounted Decorative Luminaires*"

In the included commentary from this draft it is stated "in support of efforts to reduce light pollution, EPA proposes the above intensity distribution requirements for Outdoor Post- or Arm-Mounted Decorative Luminaires. Among outdoor decorative luminaire types, these luminaires are deemed most likely to be installed not under a structure but under the open sky, therefore, the proposed requirement is intended to prevent light emissions above 90 degrees.

This category of "*Outdoor Post-or Arm mounted Decorative Luminaires*" does not belong in this new Energy Star draft. The description above describes a commercial type of luminaire, and one that is rarely sold to consumers and rarely sold into the residential market. In addition the description is completely confusing to most OEM's since most decorative wall mounted outdoor fixtures can also be considered "*Arm mounted Decorative luminaires*" also. Secondly most decorative exterior fixtures are not "directional (like their commercial counterparts) and do not have conventionally agreed upon photometric performance criteria for a residential setting.

Apparently if you refer to the included commentary from this draft, these fixtures are not what is intended in this category. There is no reason that decorative fixtures in this entire

exterior decorative residential category should be included in luminous fixture efficacy testing. This decorative residential exterior category should instead fall under the **Luminous Source Efficacy and Output Requirements for Non-Directional Luminaires** instead.

Regards,

Stephen Blackman

President
Blackman Design Associates, Inc.