

Email received on December 23, 2010 from Edmond Daniels.

To whom it may concern:

We are one of the largest manufacturers of outdoor porch lanterns in the U.S. and we have concerns over the new solid state requirements for this type of luminaire. The current standard, SSL 1.1/1.2 requires luminaire photometry with a minimum lumen output of 150 lumens. The final draft for the new Luminaire standard requires source photometry with a minimum output of 800 lumens. I assume that 800 lumens was selected due to its close resemblance to the output of a 60 watt incandescent lamp. The typical lumen loss in porch lanterns is about 50% when using incandescent lamps.

Outdoor porch lanterns vary significantly in sizes and if you look up the Home Depot and Lowe's websites, you will see sizes from 7.5" high to 36" high and from 4" wide to 14" wide, see photos of examples below. It is unreasonable to require a single source lumen output of 800 lumens for all outdoor porch lanterns. Just to give you an example, we currently have an 8" width porch lantern that produces about 200 lumens (300 lumen source), which our merchant and customers are very content with and do not want it any brighter. To comply with the new standard, and customer demand, we would need to add cost to boost the source lumens to 800 lumens and then add additional cost on optics to suppress the light output to 200 lumens. This again, is unreasonable and our customer will not accept the added and unnecessary cost. This will most likely result in our customer forgoing Energy Star, which doesn't serve anyone well.

I believe that outdoor porch lanterns should be moved to the Directional category (luminaire photometry) and minimum lumen output be set according to size. I suggest the following:

<6" width, 150 lumens
6"-8" width, 200 lumens
>8"-10" width, 300 lumens
>10" width, 400 lumens

Thanks,

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7.5"



36"

