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10-29-10

Alex Baker
United States Environmental Protection Agency
1310 L St., NW
Washington, DC 20005-4113

Re: Comments to Energy Star Program Requirements for Luminaires Version 1.0, Draft 2

Dear Mr. Baker:

On behalf of Sea Gull Lighting, please accept the following comments on the EPA and DOE's proposed Luminaires 1.0 specification, draft 2.

Luminal Efficacy of Inseparable SSL Luminaires

We believe that the current luminal efficacy requirements inadvertently create a bias against inseparable SSL luminaires. The 70 lumen per watt minimum is 60 percent higher than the 42 lumen per watt requirement an SSL retrofit must meet.

The rationale for this requirement is valid but already addressed in the Light Source Life Requirements and Lumen Maintenance Requirements. The actual and useful life of a luminaire will impact when a fixture requires servicing. Luminal Efficacy will not impact servicing.

We feel that the 42w lumens per watt requirement is appropriate for all LED luminaires.

Lamp Shipment Requirements

We believe that removing this requirement from the Luminaires 1.0 specification will allow fixture manufacturers to reduce the cost of the final product offered to consumers. We would expect an increase in sales to result from this price reduction. This will increase profitability for manufacturers while also increasing market penetration of the Energy Star brand.

Lamp manufacturers will also see an increase in their sales (to end users). We would expect lamp manufacturers will see an increase in profitability as a result of this change.

Requalification of Energy Star Products (RLF 4.3 and SSL 1.0)

We suggest implementing the requalification of existing Energy Star luminaire products in tandem with the 70 lumens per watt requirement for self ballasted lamps. We are concerned that requalification testing performed in 2011 will need to be repeated when self ballasted compact fluorescent lamps are changed to meet the 70 lumens per watt requirement.

This will also allow ample time for the EPA and DOE to publish the proposed lamp specification. Manufacturers will be able to analyze how the new standard will impact designs and efficiently integrate testing into the product revision process.

Luminaire Zonal Lumen Density Requirement for Outdoor Post Mounted Fixtures



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Sea Gull Lighting believes the adoption of this requirement will minimize the ability of the Energy Star Brand to capture share in the Residential Outdoor segment of the Lighting market. Consumers that wish to purchase a luminaire that complies with this proposal can purchase a Dark Sky compliant fixture (and will probably do so for all of their outdoor luminaires, not only post mounted ones). Consumers that are strictly concerned with energy consumption may want to purchase an Energy Star qualified fixture that provides a general light source.

This requirement will also inhibit design of post mounted fixtures, making it harder for manufacturers to offer consumers a wide variety of lighting solutions to meet their individual tastes. Consumers may decide that finding an aesthetically pleasing fixture is more important than finding an efficient one and decline to purchase an Energy Star qualified fixture.

Thank you for considering our comments.

Warmest Regards,

Ken Charton
Product Compliance Coordinator
Sea Gull Lighting