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1-14-11

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, Final Draft

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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, final draft.

#### **Photometric Performance Requirements**

We support the proposed requirements contained in this section of the specification but would like to request additional verbiage be included detailing alternatives to photometric test reports (such as an approved GU24 self-ballasted lamp). Our goal is to eliminate any potential misunderstandings between Manufacturers and Third Party Certification Bodies when the specification is adopted.

#### **Lamp Shipment Requirements**

We have received feedback from builder customers concerned with the cost implications of recessed luminaires associated with this requirement. Allowing our customers the flexibility to select their own lamp removes a significant barrier to adopt Energy Star products. Recessed luminaires that use a wattage specific socket and ballast should be considered for exemption of this requirement.

#### **Luminaire Zonal Lumen Density Requirement for Outdoor Post Mounted Fixtures**

We would like to reiterate earlier comments regarding this requirement. Since most consumers purchase a matching family of outdoor lighting fixtures this requirement will likely impact sales of fixture segments beyond post mounted luminaires (such as wall mounted, flush mounted, etc.).

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 selecting 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.



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Warmest Regards,

Ken Charton  
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Sea Gull Lighting