

Email received on January 11, 2011 from Dan State.

These are our comments on:

ENERGY STAR Program Requirements for Luminaires
Eligibility Criteria – Version 1.0 Draft 2

Background: We are designing and manufacture Tubular Daylighting Devices (TDD).
We are in business to bring the Natural / Daylight in Residential and Commercial environment.

Our Comments are for **All Indoor Luminaires** using Solid State (LEDs) on **Correlated Color Temperature (CCT)** page 20 **“The proposed nominal for residential, limits CCT at maximum 4000K”:**

- Our existing TDDs are providing natural / daylight inside of the residential or commercial environment and we would like to complement our product with an “ADD ON” Luminaire to provide the same type of lighting during the night time or to maintain the same level of illumination during cloudy days. The natural / daylight has a CCT of 5000 to 6500K. We will not be able to provide to the consumer the same level and maintain our ENERGY STAR status.
- In the previous Energy Star CFL Purchasing Guide, it is indicated that the Natural / Daylight (5000 to 6500K) is “Good for Reading”. Why we do not want to have the same conditions at home / residential like we are proposing for commercial (5000K)?
- In the LED world for the same power level, the higher the CCT:
 - o the higher the CRI will be
 - o the higher the flux will be, respectively the higher efficacy will be. **This is what ENERGY STAR is all about.**
- The EPA response to the similar comment uses the argument to ensure the uniform application of one color temperature. The transition period is definitely subject to situation like this, we have seen the same situation when the TDDs were introduced. By now the consumer is not only educated on color issue, but also is looking for the benefits of the natural / daylight. Why do we want to limit the availability of natural / daylight to the residential environment? **The criteria should allow entire spectrum (or at least provide the same CCT of 5000K for residential as maximum) and focus on higher efficacy (energy saving) and lumens.**

Dan State

Code Compliance Manager
Solatube International, Inc.