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Executive Director
Bob Parks

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International Dark-Sky Association Comments on the
ENERGY STAR Program Requirements for Luminaires
Version 1.0, Draft 1, Released May 7, 2010

Thank you for the opportunity to comment on the proposed requirements for this first version of the Luminaires part of the Energy Star Lighting Program. International Dark-Sky Association (IDA) is a non-profit 501(c)(3) organization dedicated to preserving the nighttime environment and the promotion of quality outdoor lighting.

IDA is concerned about wasted electrical energy in the form of light directed into the sky as well as glare which is excessive or misdirected light that shines into the eyes and causes visual discomfort and/or loss of visibility and light trespass which is unwanted light that spills out of the areas intended to be lighted. The IDA and its members have supported the ENERGY STAR lighting program from its inception and thank you for your work to improve outdoor lighting energy efficiency.

We have the following comments regarding Version 1.0, Draft 1:

- We sincerely appreciate the ENERGY STAR proposal to require shielding of post and arm-mounted luminaires to minimize wasted light into the sky.
- We agree that shielded luminaires where roof or other shielding is absent is a simple, inexpensive approach and will allow many luminaires already on the market to qualify for ENERGY STAR.
- We would like to see consideration inclusion of additional shielded luminaire types to limit wasted light that cause glare and light trespass.
- Looking forward to seeing similar requirements for commercial ENERGY STAR luminaires and especially those used for roadway lighting and those using LEDs.

IDA would be pleased to answer any questions regarding these comments. Please contact me at 202-684-7090 or bparks@darksky.org with any questions regarding these comments.

Sincerely,

Bob Parks
Executive Director
International Dark-Sky Association

IDA Offices

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