

Email received on June 21, 2010 from Michael Grather.

Hello,

Thank you for the opportunity to provide comments on the new Energy Star Luminaires first draft. Please see my comments below:

Are path lights included in the scope of the document?

I think that it may be important to better define the difference between downlight pendants and non-directional pendants.

The "directional luminaires" section of luminous efficacy requirements does not specify that the photometry performed on fluorescent luminaires needs to be performed as absolute photometry.

The required documentation section of the directional luminaires luminous efficacy requirements allows a platform approval number as a method of proving conformance to the standard. Using the system results alone would mean system efficacy, not luminaire efficacy is used for the requirements. This also would not support the zonal lumen density requirements.

The sample size requirements are not clear for fluorescent luminaires in the luminous efficacy requirements for directional luminaires.

The zonal lumen density requirements throughout the document should indicate that the angular requirements are measurements of vertical angles (ie: ...lumens (initial) within the 0-60deg vertical zone).

The "inseparable luminaires" category on page 13 seems to be a "catch-all". Does this mean that any luminaire with inseparable componentry, no matter what the application, is required to meet the 70 lpw requirement alone?

The "Luminaire must not emit any light above 90 degrees" statement on page 13 will be a problem to measure. Laboratories cannot practically measure 0. I would recommend an upper limit to the amount of lumens above 90 degrees (less than 1% of total luminaire lumens for example).

Thank you,
Mike Grather

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