

Thursday, January 13, 2011

Palm Coast Imports feedback to EPA for EStar proposed "Final Draft Luminaires Version 1.0 Specification"

1. Page 13 - relating to the initial luminous efficacy requirements for ceiling fan light kits under the Accent Lights category – Palm Coast Imports recommends that the 35 lm/W requirement be used for both non-directional and directional ceiling fan light kits. This update will be as simple as removing the word "directional" so the requirement reads *"includes ceiling fan light kits"*. The specification is currently explicit only to directional light kits. As such it is not clear where the non-directional requirement for ceiling fan lighting is specified other than defaulting to the Solid State LED light Engine category (Page 11) and 65 lm/W (increasing to 70 lm/W in 2013) which is significantly higher and cost-prohibitive for the consumer market at this time given the current state of LED technology. This definition change will also address the current ambiguity in requirements between directional and non-directional lighting related to ceiling fans. If both types are required to meet the same luminous output there should be less confusion across the board in this area.
2. Page 14 – relating to inseparable SSL – why is the efficacy 70 lm/W? This is the default configuration for LED light engines if they are not serviceable (with connectors). It is not understood why this configuration would demand an increased efficacy compared to light engines with interconnects ?
3. Page 26 - relating to light engines and non-directional SSL – Palm Coast Imports recognizes that the LED module/array will outlast the light engine in most cases and there is a desire to make the light engine "replaceable". It needs to be noted and further discussed that accessing and replacing or modifying any of the light engine's components is a significant safety issue. Although it is noted that a certified electrician should service the light engine, we are afraid that, by adding connectors to each end of the light engine, it becomes a disposable or throwaway component to the consumer. This could adversely encourage the consumer to make adjustments and/or modifications.

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