



Sea Gull Lighting Products, LLC
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6-21-10

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, Draft 1

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, draft 1.

Photosensor Control Requirement

Market feedback indicates remote photosensors are preferred to integral controls. Photosensors restrict installation locations available to consumers. Use of a remote photosensor incorporates the benefits of an integral control while allowing for greater flexibility during installation. We have experienced, and continue to experience, a high volume of quality problems with these components.

The elimination of this component may allow manufacturers to reduce pricing and increase market demand for energy efficient products. Removal of this requirement will increase design choices available to the market place.

Lumen Maintenance Requirement for Solid State Lighting Luminaires

Sea Gull Lighting endorses option 1 (page 16 of the 1.0 draft) for solid state luminaires. Option 2 will increase the testing required for qualification and raise product price. Increased product price will diminish market acceptance of this technology.

Enhanced Qualification and Verification Testing

We are concerned with the ability of third party laboratories to complete qualification and verification testing in a reasonable period of time. This requirement will create a workload that exceeds current third party laboratory capabilities.

The use of a third party lab for qualification testing will significantly increase product development time and cost, and ultimately result in higher selling prices for Energy Star compliant luminaires.

We feel the proposal to increase verification testing frequency from once to twice a year will create an unfair financial burden to manufacturers and consumers.

Product Qualified to RLF 4.3 / SSL V1.1

As an active manufacturing partner in the Energy Star program we are eager to learn how implementation of the 1.0 Luminaires specification will impact products that are currently qualified to RLF 4.3 / SSL V1.1. Will products be 'grandfathered' in to the new specification? Will the specification include a streamlined qualification procedure for RLF 4.3 / SSL V1.1 products?

Note to include a "full cut off" requirement for Outdoor Post or Arm Mounted Fixtures



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We believe the adoption of this requirement will create confusion with the market accepted Dark Sky Certification program. The Dark Sky marking is already used by manufacturers, distributors, and consumers to identify luminaires that minimize light pollution.

Thank you for considering our comments.

Sincerely,

Bart Lawrence
Product Manager
Sea Gull Lighting