



sea gull lighting®

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Richard H. Karney, P.E.
ENERGY STAR Products Manager
U.S. Department of Energy

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Dear Mr. Karney

On behalf of Sea Gull Lighting, thank you for the opportunity to comment on the Proposed Category “A” requirements to the ENERGY STAR® Program for Solid State Lighting Luminaires. Specific comments are below.

Cove lighting - Asymmetric Distribution (for high-performance architectural luminaires)

DOE should consider adding another cove lighting application for a relatively symmetric distribution (above 90 degrees) because of the large volume of cove lighting and over cabinet lighting that is specified in the residential, retail, restaurant and light commercial markets. Most cove lighting sold and installed currently uses a relatively symmetric distribution, and including this product category would significantly increase the amount of actual lighting applications that the ENERGY STAR program can impact, thus yielding greater energy savings for the program.

In most cove lighting applications the designers and installers prefer a “simple-to-install” lighting solution that provides a general ambiance to the space. Additional light sources are usually used for functional illumination in the space and the cove lighting is there to provide an “ambiance.” A minimum light output of 200 lumens per linear foot would suffice in this application.

Although an asymmetric distribution is warranted in some commercial applications where the cove is being used as a primary light source, in residential and other light commercial applications it is not necessary for general illumination and many specifiers will shy away from a product that adds complexity for installation.

Ceiling-mounted luminaires with diffusers

The proposed requirement for ceiling-mounted luminaires does not include a Zonal Lumen Density Requirement at this time. Given the broad range of ceiling mounted luminaires and that their design changes frequently based on architectural and design trends, we encourage DOE not to include such a requirement at any time. Including such a requirement would significantly limit the realized energy savings.

Thank you for your consideration of these comments.

Sincerely,

Paul Vrabel, LC, PMP
Director, Energy Efficient Products
Sea Gull Lighting

A Generation Brands Company