

HADCO/Genlyte
100 Craftway
Littlestown, PA 17340

Mr. Karney,

I am writing to you on behalf of HADCO to provide some comments on the proposed Energy Star requirements for SSL luminaires. The following is a brief collection of comments or concerns that were raised during a recent meeting to discuss this topic.

From Page 2 - Scope

If a particular luminaire does not fall within a specific niche application (Category A), does the luminaire automatically fall into Category B?

From Page 3 - Outdoor Luminaire Requirements

The requirement for luminaires over 13W to include a photocell raises two concerns; the first being that there is no definition of what a "residential" luminaire is contained within this standard, and secondly, most commercial and residential landscape lighting systems feature a centralized photocontroller, rather than individual photocells on each fixture. The purpose of having a single photocontroller in the system is to prevent luminaires that are located in tall shrubbery and overlying trees from turning on prematurely. We would recommend that landscape fixtures be excluded from this requirement.

From Page 7 - Outdoor step lights

The minimum light output of 100 lumens does not specify how/where to measure the light output. Unless this is being specified in IESNA LM-79, then there should be some guidelines created for testing the lumen output.

From Page 7 - Outdoor pathway lights

Again, the minimum light output of 100 lumens does not specify how/where to measure the light output. Some guidelines for testing should be created for testing the lumen output. Also, the Zonal Lumen Density Requirement would be more beneficial if it illustrated what is considered the 0-90 degree zone.

Regards,
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Product Marketing Manager

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