

National Specialty Lighting

Richard,

My name is Edward J. Cook and I own National Specialty Lighting. We currently offer numerous UL listed LED light fixtures for the residential and light commercial market. Please check out our website at www.nslusa.com. Below are some comments I have with regard to the pending ENERGY STAR criteria.

1. Lower the power factor requirement from 0.9 to >0.5 to match that of the present CFL energy star listing. Using a 0.90 PF significantly increases size and adds to the cost of the driver.
2. Replace LUMEN ratings of fixture specs with LUX or foot candles. It is easier and more meaningful for a fixture manufacturer to test for LUX or foot candles versus raw LUMENS.
3. Add simple testing procedures for the luminaries. Such as simple FIXTURE electrical efficiency ($>80\%$) ratings, simple light output ratings (LUX). Currently there are some proposed specs such as L70, efficacy, color temperature and CRI, which should be specified and tested by the component manufacturer. NOT THE LIGHTING MANUFACTURER. The goal is to make it easier to get a LED fixture ENERGY STAR rated. This would enable a SERIES of LED fixtures to be listed versus individual fixtures each time separately.

Sincerely yours,

Edward J. Cook