

August 29, 2002

Darcy Hoffmeyer  
ICF Consulting  
1850 K Street NW  
Suite 1000  
Washington, DC 20006

Dear Ms. Hoffmeyer;

Datrex, Inc. is a manufacturer of photo-luminescent exit signs that are compliant with the latest edition of UL924 Standard for Emergency Lighting and Power Equipment.

We are writing you to express our concern over our product's current ineligibility with your existing criteria for exit signs. While we fully support the concept of the U.S. EPA's Energy Star Program, we feel the intent of the program is compromised by not allowing for other more efficient technologies to be eligible.

We are glad to see that the Energy Star Program is looking to update its current criteria for eligibility. This is a step in the right direction. We are pleased to offer the following comments.

After reviewing the current (version 2) criteria for exit signs, it appears that much of the UL 924 standard has been borrowed, but not in its entirety. The acceptance of new technologies has clearly been established by NFPA Life Safety Code 101, ICBO, and many other codes. The NFPA Life Safety Code 101 addressed this issue in the 2000 Edition by saying that photo-luminescent exit signs must be listed to UL924 (page 227, Section A.7.10.7.2). UL further addressed the issue on July 11, 2001 with the SG Supplement.

It is our opinion that the U.S. EPA's Energy Star Program criteria be modified to accept any exit sign that is listed and found to be compliant to the latest UL924 standard and also meets your established power limits. We also suggest that all criteria based on UL 924 be removed and replaced with references to that standard, highlighting the power limits which would differentiate an Energy Star compliant sign from one that is not. It is somewhat illogical that a technology superior in saving power should not be eligible.

We are very excited with the potential change to the Energy Star Exit Sign Eligibility Criteria. If these changes are made, we feel that the program is headed in the right direction.

Best regards,  
David Mills  
Datrex, Inc.