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LEADER IN LIGHTING SOLUTIONS
An Acuity Brands Company

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CALIF ENERGY COMMISSION

JUN 18 2002

RECEIVED IN DOCKETS

Mr. Gary Flamm
Mr. Mazi Shirakh
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

June 13, 2002

Re: **California Outdoor Lighting Standards**

Dear Mr. Flamm and Mr. Shirakh;

We are writing to express our concern as regards the current California Outdoor Lighting Standards, which is up for public comment. We would like to address the portions of the document that cover Outdoor Signs and Billboards, specifically externally illuminated signs and internally illuminated panels.

Our company, as a part of the Acuity Lighting Group, offers a broad range of lighting solutions to the market, For over 30 years, Holophane has been a leading luminaire manufacturer and supplier to the Outdoor Advertising and Sign industry. Holophane's Media Group supports the Outdoor Advertising and Sign industries with in-depth technical knowledge of product and applications.

We have reviewed the document and have the following concerns:

> Absent from your bibliography are any conversations with or information taken from the two largest trade organizations that support the Billboard and Sign market: The Outdoor Advertising Association of America (OAAA) and the International Sign Association (ISA) represent the billboard and sign markets respectively. We believe a well-rounded standard could not be crafted without involvement from either of these two very important trade groups or their appointed representatives. The OAAA and ISA have a history of working with public and government groups striving to address all concerns.

2. The Lighting Power density requirements are too restrictive. The current method of internally illuminating panel signs requires the use of a lamp source that will provide an acceptable illumination level, as well as a uniformly lit sign. In addition to a bright, uniformly lit sign, the lamp must also perform in applications where the ambient temperature may drop well below 25° C. Forcing the industry to adopt a lamp source that may not provide an acceptable level of illumination or, by default, a lamp source that must be installed on lamp centers that prevent a uniformly lit sign, will have a significant negative impact on the visual quality of the sign. This will ultimately diminish the economic value of the end product.

3. The majority of current sign installations for externally illuminated and internally illuminated panel signs exceed the LZ3 energy requirements. The process to qualify as an LZ4 seems to be burdensome. The allowable size of an LZ4 area is also far too restrictive. Limiting the jurisdiction to a 2-mile radius in any direction is not practical to most urban areas.

4. In ***Lighting Equipment, number 1,item b,*** the recommendation is too narrow. This recommendation prevents the sign fabricator from considering other energy efficient lamp sources, such as a metal halide lamp. Preventing the sign fabricator from being able to consider such point sources is counter to the mandate of saving energy. The luminous intensity of a linear lamp source may not be great enough to effectively illuminate a deeper cabinet panel sign. In certain sign applications, such as panel signs with depths greater than 18", two rows of lamps may be required to illuminate the sign to an acceptable level while maintaining uniformity. In this application, the total energy consumed with a T-8 system may be greater than the energy consumed by an alternative lamp source. The use of an energy efficient HID lamp source could create sufficient illumination, minimize installed cost, as well as consume less energy than a multi-bank fluorescent system.

5. In ***Lighting Equipment, number 3,item c,*** an assumption is made that top mounted fixtures will incur less dirt depreciation over time. There is no scientific research supporting this assumption. A top mounted fixture will collect atmospheric containments (such as fumes, soot, etc.) allowing the lamp source to "bake" these containments onto the lens. More research should be conducted before recommending mounting locations of luminaires. It is also not clear why mounting location would impact energy consumption. In addition to limited research on the value and impact mounting location might play, recommending a top mount location would add considerable cost and safety concerns. Shadowing created by a top mounted fixture would also negatively impact the daytime appearance of a sign. At night, the veiling reflectance created by the top mounted luminaire

will detract from the visual experience as well. Accessibility to the luminaire for lamp replacement and general maintenance would impact safety.

6. Whether the luminaire is mounted on the top of a billboard or below will not reduce energy consumption. Most of today's available lamp sources operate effectively and efficiently regardless of mounting location. The efficacy of many alternative lamp sources is comparable to or may exceed the efficacy of a T-8 fluorescent lamp.

7. In ***Summary of Proposed Standard,*** *Shielding,* the recommendation "for most applications, only cutoff luminaires are allowed" is far too restrictive. By default this recommendation demands all billboards be illuminated from the top while using a fixture with a flat lens or a shielded luminaire. In addition to the points made above as to why this is not practical, the ability to illuminate a billboard with a cutoff luminaire is also cost prohibitive. Meeting the energy requirements of the various "Lighting Zones" while utilizing a cutoff luminaire will result in the use of lower wattage, less efficient, and less cost effective lighting systems. Overall lighting levels may also be reduced therefore diminishing the signs ability to convey a message and offer economic value to the general public.

In conclusion, we want to strongly encourage the California Energy Commission to contact both the OAAA and ISA to seek their input.

Thank you for your time and consideration.

Sincerely,

Mark Sieber
Regional Sales Manager
Media Sales Manager

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