



**Illuminating**  
ENGINEERING SOCIETY

**Illuminating Engineering Society  
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December 9, 2010

Scott Cooper  
Vice President, Government Relations and Public Policy  
American National Standards Institute

Dear Mr. Cooper:

In response to the *Federal Register* Notice requesting comment on the effectiveness of Federal Agency Participation in Standardization, the Illuminating Engineering Society of North America (IES) is providing the following response.

Federal agencies' participation in the development of standards is extremely important to IES in two specific ways. Communicating information from agencies on government initiatives and programs affords developers the opportunity to contribute technical input to these programs. In addition, participation of government agency personnel on developer's standards committees provides a welcome and necessary perspective to these consensus bodies.

In the area of new technology initiatives, the US DOE approached a network of standards developers to assist in its commitment to advance the development and market penetration of its solid state lighting (SSL) program, which encourages the use of energy efficient white light sources. IES, a recognized developer of light source testing procedures, was asked to provide the industry with SSL testing methods to insure uniformity and consistency of industry product performance reporting. IES has developed two test methods to date for measuring photometric and lumen depreciation performance of these source types. Two additional test methods are underway. For this program activity DOE identified the need and IES responded.

In addition DOE supported the contribution of a Pacific Northwest National Lab employee in the development of an IES guide to understanding the SSL technology and its application. The end resulting document has been approved by IES and is in the developer's bookstore.

In the work of other committees, IES enjoys the support of various federal agency employees as subject matter expert members of technical committees in the development of standards and guidelines used by engineers, architects, designers, and building owners and operators. Specific committees with agency representation include: Roadway Lighting (US DOT/FHWA); Energy Management (DOE/PNNL and NREL); Research (DOE/LBL); Photobiology (US Army, US Food and Drug Admin., and NIST); and Testing Procedures (EPA and NIST).

IES as an ANSI accredited standards developer has a policy of openness for committee membership. The standards produced by these committees are led by the developer with or without an agency initiative, but in many cases, as a result of agency staff participation, a two way benefit may result. The standard content may include the answer to a specific agency need and/or the resulting document may become a useful agency reference. (IES documents are referenced in the National Voluntary Lab Accreditation Program (NVLAP).)

We appreciate the opportunity to submit comments and would be pleased to provide any additional input if requested.

Sincerely,

A handwritten signature in blue ink that reads "Rita M. Harrold". The signature is written in a cursive style with a long, sweeping underline.

Rita M. Harrold  
Director of Technology