

DOCKETED

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Comment Received From: ROBERT A, SHEARER

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Inconsistent Form Entries on Form NRCA-LTI-03-A

Additional submitted attachment is included below.

Aug 27th, 2015

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COMMENT PERIOD
RE: 2016 Nonresidential
Compliance Manual and Documents

Re: Docket # 15-BSTD-01
2016 Acceptance Testing Forms: Comment 02

INTRODUCTION:

The author is primarily concerned with changes to the Lighting Controls Acceptance Certification Forms included in the back of the 2016 Nonresidential Compliance Manual and will reserve comments on the other content of this manual.

ABSTRACT:

The Form entry for “**general lighting design footcandles**”, (which appears *three times* on Form: NRCA-LTI-03-A), has an inconsistent entry. This causes problems for interactive form designers, and for Field Technicians who may have to explain a blank form entry to the Authority Having Jurisdiction.

EVIDENCE:

A cursory examination of this Acceptance Testing Form will disclose these errors.

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02. System Information				
Zone Type: Skylit (Sky), Primary Sidelit (PS), or Secondary Sidelit (SS)				
Control Type: Continuous Dimming with more than 10 light levels (C), Stepped Dimming (SD), Switching (SW)				
Design Footcandles: (enter number or “Unknown”)				

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c.	If automatic daylighting controls are mandatory, are all general lighting luminaires in daylight zones controlled by automatic daylight controls? (Y/N)			
d.	Documented general lighting design footcandles . (Enter -footcandle value or “Unknown” (U))			
e.	Power estimation method. Measured Amps Multiplied by Volts, Volt-Amps (VA), alternate option is Measured Watts (W)			

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d.	Documented general lighting design footcandles . -If design footcandles not documented leave blank (enter fc)			
e.	Power estimation method. (see line r) -Default ratio of power to light (Dfc), cut-sheet ratio of power to light (CSfc) If CSfc – attach cut-sheet. -Enter Dfc or CSfc ,			

So ... *Three* form entries, all requiring the same data, with ***THREE DIFFERENT*** responses required:

- 1) It is left as an exercise to the reader to enter the word “Unknown” in the tiny space allowed;
- 2) Enter a “U”;
- 3) Leave the entry blank – (for CEC personnel who have never done Acceptance Testing – Building Inspectors don’t like Blank Spaces on Forms)!

CORRECTIONS REQUIRED:

Take the “Page 3” example for all three of these and modify the form. If “Design Footcandles” – (a term not defined by the code) – are unknown, (which they will be ...), have the form user enter “U” in this slot.

CONCLUSION:

The author extends his gratitude for the opportunity of performing a review of a form which is signed under penalty of perjury by Contractors and Field Technicians in the State of California.

Thank you for considering my comments,

Robert A. Shearer, BSEE