



GE Consumer & Industrial
Lighting

1975 Noble Road, Building 335C
Cleveland, Ohio 44112

via electronic mail

October 14, 2005

Mr. Richard Karney, Energy Star Program Manager
Office of Energy Efficiency and Renewable Energy
US Department of Energy
Washington, DC

RE: Comments on draft Energy Star specification version 4.0, dated 8/30/05

Dear Mr. Karney:

General Electric is pleased to provide the attached comments on the version 4.0 draft of the Energy Star specification for CFLs dated 8/30/05.

Sincerely,

A handwritten signature in black ink that reads "Anthony Serres". The signature is written in a cursive style and ends with a horizontal line.

Anthony Serres
Fluorescent Systems Engineer

Response to draft Energy Star specification version 4.0 dated 8/30/05

In addition to the comments we have submitted through NEMA, General Electric would like to make the following comments in response to a proposal made during a presentation at the September 20, 2005 stakeholder meeting.

The Energy Star program was conceived as a method to increase the efficiency of energy consuming products. In the case of screwbase compact fluorescent lamps (CFLs), it does this through minimum efficacy (lumen per watt) requirements among others. Manufacturers have design freedom to meet the program requirements. At the September 20th stakeholder meeting, one stakeholder suggested that limits should be placed on the mercury content of CFLs.

Limiting the mercury content of a lamp will not improve its energy efficiency, and thus should not be included in the Energy Star specification. Such a limit is not performance related and essentially dictates how a lamp should be constructed. The specification must remain "performance-based" allowing manufacturers to decide how to best meet performance objectives. Specifications that begin to dictate the construction of a lamp are of great concern to manufacturers. These types of requirements have the potential to remove all flexibility and innovation from lamp design. They are very inflexible and cannot anticipate future design needs.

We oppose extending Energy Star CFL requirements to include establishing maximum mercury limits or the disclosure of mercury content levels.