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As Energy Star partner, Osram Foshan Lighting Company, Ltd. would like to submit the following comments to the proposed revisions of the current Energy Star Specifications for CFLs:

Minimum Efficacy 5 base-up / 5 base-down.

The proposal reads: 'The lamp efficacy shall be the average of the lesser of the lumens per watt measured in the base-up and base-down positions.'

This conflicts with IEC 60969 Appendix A, where the test position is base-up only, but also with IESNA LM-66-00, clause 7.6 where "The standard orientation is base up."

Manufacturers' measurement set-ups are typically designed for base-up operation. Especially for high-quality computer-controlled automatic measurement systems, a change may be very difficult and costly.

We propose:

Measure photometric data base-up only. Drop the above requirement. Consumers' interests are protected by FTC regulations dating back to 1996 that require declaration of more than 5% difference.

Early Labeling @ 1000h no longer possible.

Problem: Qualification will take a year (or longer for long-lifetime models). Lamps with newest technology and most energy saving potential will not be Energy Star listed; Energy Star listed models will be built with older technology. Furthermore there will be very few new listings in the first year.

We propose:

Keep early labeling at 1000h, or allow qualification @ 40% of rated lifetime. Manufacturer must report average rated lifetime at end of lamp life as stated on packaging.

Delisting / Unqualification of CFL Products.

There is no provision for the manufacturer to voluntarily remove a model, even if no lamps of this model have been sold at all, or are no longer available.

Problem: Marking such a model 'delisted' may give the consumer the wrong impression that many products are of poor quality, and consumer may become reluctant to switch to energy saving lighting. Furthermore, a punishment for the manufacturer is not called for, if the manufacturer "does the right thing" and (temporarily) draws back a model before it goes into sale at all.

We propose:

Mark a model as 'retired' on request of the manufacturer if the manufacturer provides data that show that the lamp met the specifications and that the lamp is no longer available.

Remove a model from the list completely on manufacturer's request if manufacturer provides data to prove that no lamps have been sold at all. No penalty / probation period in that case.

Delist and unqualify a model in all other circumstances as per existing Energy Star specifications.