

TCP Comments on Energy Star Second Draft

1. TCP would like to establish an alternate method of establishing unit shipment data to the Energy Star program. Also of concern is the potential overlap of information that would be provided by TCP and our large retailers.
2. TCP supports the addition of CCT ranges (color categories) to be added to the program. We feel this will help consumers make more informed decisions as to what color of light they are purchasing and will ultimately lower returns.
3. The addition of the decimal requirements will not significantly affect TCP's test results.
4. The requirement to test reflectors to be used in recessed cans in the base up position is unclear. Most manufacturers do not designate a reflector for recessed can use only. TCP is not opposed to this requirement, but would like to see it clarified.
5. TCP supports the early labeling requirement at 40% of life even though this may not always allow brand new products to be brought to market with the Energy Star label. We do feel the marketplace will benefit in the long run if it will keep some of the inferior products from being labeled altogether.
6. The reduction of the transient sample size does not present any issues.
7. TCP is strongly opposed to a mandatory 2-year warranty on all Energy Star labeled products. Although the Energy Star program is primarily a residential program, the draft clearly states that all packaging and warranty information also applies to our Commercial business as well. Commercial use is often 24 hours a day, seven days a week. Under these circumstances a lamp would only last about a year. Forcing a 2-year warranty under these conditions goes beyond the scope of what the lamp has been built and tested for.
8. TCP would like to see additional incandescent equivalency charts for globes and reflectors added to the spec. This would give consumers a more accurate lumen comparison.
9. TCP supports DOE's efforts in maintaining a firm deadline for testing data to be submitted.
10. TCP is strongly in favor of being able to "retire" a product that is no longer in use. We would also like to see an option made available that would link or show that a product has been upgraded. The current chart on the Energy Star website gives a very misleading impression as to the status of TCP's products. A visitor to the site cannot tell that the products we replaced with an upgraded version was replaced rather than de-listed for performance. We would like to find a way to make this more clear on the website.
11. TCP is strongly in favor of including CFL's with candelabra bases in the revised spec.