

25 August, 2008

Mr. Alex Baker
ENERGY STAR Lighting Program Manager
US Environmental Protection Agency
1310 L Street, Suite 933
Washington, DC 20005

Dear Mr. Baker:

These are comments from the American Lighting Association (ALA) representing the residential/decorative lighting industry in response to the EPA/Energy Star Program Requirements for Residential Light Fixtures, Version 4.2, issued June 2, 2008.

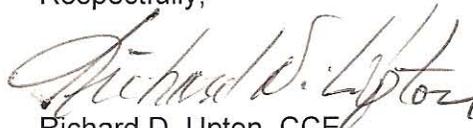
The ALA is pleased to be a long-term supporter of this Energy Star residential lighting fixture program. ALA manufacturers and retailers participated in a high percentage of the 15 million Energy Star residential lighting fixtures sold in 2007. That participation is part of our long-term goal to provide a wide variety of high-quality energy-efficient lighting choices to our residential lighting customers.

We particularly appreciate the approach that has been taken over the past 10 years so that the many types and styles of residential/decorative fixtures on the market can be Energy Star qualified. Qualification has become a relatively efficient process and many manufacturers have taken advantage of the ALA/NEMA prequalification lamp/ballast matrix to enhance the process.

The 6/2/08 addendum to V. 4.2 is encouraging news because it allows ALA manufacturers, who are increasingly using solid state light sources, to continue to qualify a variety of their new products for Energy Star listing. This is especially important during the present unusually-challenging market.

We recognize however, that not all of the technical issues involving solid state lighting systems have been resolved. Quality lighting, quality lighting product performance and proper application of lighting are critical goals of Energy Star and are also critical goals for ALA manufacturers. We urge that every effort be made to ensure quality while continuing to include the wide variety of types and styles that are important to our industry and consumers.

Respectfully,



Richard D. Upton, CCE
American Lighting Association