

Email Received on August 21, 2008

I do not believe our organization has any significant comments to the RLF 4.2 Proposed revisions as there are essentially no new requirements from an engineering or technical requirements perspective. The new 4.2 revision introduces the ASSIST testing procedure such that Residential Light Fixtures using Solid State (LED) light sources can theoretically be tested in a similar manner the Fluorescent light sources have been tested for years but has no new specification requirements. Since we have not developed and tested any Solid State Residential Light Fixtures at this time and attempted to test them with the ASSIST Testing guidelines, we have no experience to comment from nor does the comment request ask for comments directly related to the previously developed test procedure, only to the proposed RLF 4.2 requirements document referencing the ASSIST procedure.

On the other hand, we do think that the approach the EPA took of developing a test procedure significantly different from the one introduced much earlier by the DOE Energy Star program, is very confusing from both a Manufacturer's and a consumer's perspective. While the reasoning used by the two different agencies are fundamentally sound taken independently, the issuance of the two significantly different and valid qualification criteria, is going to lead to confusion, dissatisfaction and ultimately lead to weakening the Energy Star program over all.

We therefore, look toward the ultimate combining of the requirements and subsequent commenting process for the final Energy Star requirements document for Light Fixtures utilizing Solids State Light Sources which must eventually be released.

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