

Intertek ETL Semco Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 2 Eligibility Criteria – Version 4.0

Comment 1

I wanted to offer the following comments related to the Energy Star Residential Light Fixture Eligibility Criteria, Version 4.0 (Draft 1).

Page 22 "Noise"----Suggest test data be supplied by a NVLAP accredited laboratory.

Page 22 "Dimming"----Suggest test data be supplied by a NVLAP accredited laboratory covering electrical/photometric scope of activities.

General comment: Throughout the document, eliminate the allowance for test report to be submitted by manufacture or change to require test report from a laboratory accredited by an OSHA NRTL.

Thanks for the opportunity to comment on this standard.

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Comment 2

I just got off the phone with our Accreditations Manager and he pointed out that our accreditation by OSHA as a Nationally Recognized Testing Laboratory does not authorize us to be an accreditation body. Therefore, any reference to "...test report from a laboratory accredited by an OSHA NRTL" would be inappropriate. If you need more information about it, please feel free to contact me any time.

David