

***Lightolier comments on the Revised Final Draft Version 4.1 ENERGY STAR
Specification for Residential Light Fixtures,
September 11, 2007***

The following is our comment regarding mercury requirements for the Final Draft of the ENERGY STAR Residential Light Fixtures Specification Version 4.1.

Vermont has already enacted legislation requiring labeling to explain mercury recycling. Vermont has accepted www.lamprecycle.org as the web link that explains where and how to recycle mercury containing lamps. In response, manufactures have added labeling to all luminaires that use mercury containing lamps:

IF LAMP IS MARKED (HG)
IT CONTAINS MERCURY.
FOLLOW APPLICABLE DISPOSAL LAWS
SEE WWW.LAMPRECYCLE.ORG

The proposed Energy Star labeling, while having identical consumer education intent, differs in wording and web site reference.

Having two labels with similar information is redundant & may cause confusion. I suggest adding "or equivalent" to the Energy Star requirements and allowing the language/web site legislated under the Vermont law to be used.

Please let me know if this requires clarification or further comment.

Michael S. O'Boyle, LC
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