



MEMORANDUM

DATE: December 10, 2001

TO: ENERGY STAR® Residential Light Fixture (RLF) Partners and Other Interested Parties

FROM: Peter Banwell, ENERGY STAR Product Manager

RE: **Clarification to the ENERGY STAR RLF Version 3.0 Eligibility Criteria and Extension of the Effective Date**

Since the release of the latest Residential Lighting Fixtures (RLF) Eligibility Criteria on July 2, 2001, ENERGY STAR has gradually received data on RLF Version 3.0 qualifying models. To date, several hundred models have been approved and added to the ENERGY STAR Web site. While we look forward to a robust Product Listing, we recognize that the transition to new energy-efficiency and testing criteria takes time and often generates unforeseen questions.

Accordingly, ENERGY STAR has decided to extend the RLF Version 3.0 effective date by three months to April 1, 2002. Partners submitting new products must still comply with Version 3.0 (i.e., products attempting to qualify under Version 2.1 will not be accepted). ENERGY STAR will continue to display on its Web site through March 29, 2002, the current list of products that qualified under Version 2.1.

The following information is intended as a clarification to the Version 3.0 Eligibility Criteria. This clarification comes as a result of partner questions on product testing and labeling. Please note that an electronic copy of this document also can be found in the "Lighting" section under "ENERGY STAR for Products" on the ENERGY STAR Web site at www.energystar.gov/library.

Testing Multiple Lamp/Ballast Combinations

In general, it is not ENERGY STAR's goal to have manufacturers test every conceivable lamp/ballast combination. We recognize that the costs of pursuing such an approach would outweigh the benefits. However, ENERGY STAR is committed to ensuring that products carrying the ENERGY STAR label meet its energy-efficiency specifications, and thus comprehensive testing is necessary.

Based on recent inquiries, there are two testing scenarios that require clarification.

1. *Fixtures with one ballast type that can use multiple lamp types:* In this case, ENERGY STAR requires that the fixture only be tested with one lamp type. The lamp type must either be: a) the one supplied with the fixture or b) if a lamp is not provided, one of the lamp types listed on the product packaging. Please note that ENERGY STAR expects that all lamps listed on the packaging would comply with the specification when operating on the fixture's ballast. To ease the burden on the manufacturer, however, test data need only be submitted for one lamp type operating on the fixture ballast.
2. *Same fixture uses different ballasts (either in terms of the type or manufacturer):* Due to many variations in ballasts, ENERGY STAR requires that each different ballast undergoes testing and that supporting data is submitted for qualification. For example, if an RLF partner plans to use ballasts from several manufacturers in one fixture, each manufacturer's ballast must be tested with the lamp supplied with the fixture or one of the lamps listed on the product packaging.



Testing Exemptions for Magnetic Ballasts

Magnetic ballasts do not need to be tested for ballast frequency and transient protection, as they are not applicable. We apologize if the testing criteria were vague and caused any confusion.

Testing and Data Submittal Procedures

Product testing must be performed in accordance with the Reference Standards outlined in Table 3 of the Eligibility Criteria. For a complete list of the required testing documentation, please refer to the RLF Qualified Product Information (QPI) Form. The QPI form is available at www.energystar.gov/library in the "Lighting" section under "ENERGY STAR for Products."

Package Labeling

Table 1 of the Version 3.0 Eligibility Criteria reads:

"For fixtures that do not include lamps, the fixture package must provide a list of lamp types, that, when used with the fixture, result in the fixture complying with the specification. This list must be clearly visible to the consumer on the fixture packaging."

As such, manufacturers are not required to provide specific lamp manufacturer names and model numbers on the packaging. Rather, generic lamp listings, such as F32T8, will suffice.

Durability Testing Requirement

While ENERGY STAR considers the development of a durability-testing requirement, it sees no reason why it should not begin implementation of Version 3.0. As you may be aware, the Lighting Research Center (LRC) is currently conducting research on this issue on EPA's behalf. The outcome of this research is impossible to know at this time. When available, the results of this research will be discussed with industry to determine practical implementation. As always, ENERGY STAR is open to and welcomes any comments and suggestions from industry on durability requirements.

OEM Testing and Data Submittal

To assist fixture manufacturers in easily identifying energy-efficient components, ENERGY STAR plans to initiate a new process for reviewing OEM test data. This process is briefly described below and will be refined in the coming months, if necessary.

Beginning in January 2002, OEMs may submit lamp and ballast lab data (based on the ENERGY STAR testing and documentation protocol outlined in Section 4 of the Eligibility Criteria) directly to ENERGY STAR to determine qualification for a given lamp/ballast combination. In return, ENERGY STAR will provide the OEM with a *Letter of Qualification* for the given lamp/ballast combination, which will specify the performance requirements that have been met. OEMs are then encouraged to provide these letters to fixture manufacturers. While fixture manufacturers may submit the Letter of Qualification in lieu of lab testing reports, they are still responsible for completing and signing a Qualified Product Information form for each lamp/ballast combination, and submitting any required data not covered by the Letter of Qualification.

In closing, ENERGY STAR is committed to working with the lighting industry to develop a specification that promotes high-quality, energy-efficient products. Please feel free to contact me or Meghan Grady (ICF Consulting) at 202-564-9408 or 703-934-3089, respectively, if you have any additional questions or concerns.

Thank you, and happy holidays.