



Terry K. McGowan  
American Lighting Association  
Director of Engineering and Technology  
3559 Birchtree Path  
Cleveland Hts., OH 44121

Tel: 216-291-1884 — [lighting@ieee.org](mailto:lighting@ieee.org)

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Ms. Kathleen Vokes  
Energy Star® Lighting Program  
U.S. Environmental Protection Agency  
Washington, DC (via e-mail)

Dear Ms. Vokes:

This letter is a response from the American Lighting Association (ALA) to the Energy Star telephone conference and presentation of April 6, 2010 regarding Energy Star Enhanced Testing and Verification of Lighting Products.

The ALA is a trade association that serves the residential lighting industry in the U.S., Canada and Caribbean. Its members are residential lighting retailers, luminaire manufacturers, designers, representatives and component suppliers. The ALA has supported the Energy Star Lighting Program from its inception and continues to promote Energy Star both directly through member lighting showrooms and through efforts such as the Lighting for Tomorrow Energy-Efficient Lighting Fixture Design Competition which requires the winning luminaire products to be Energy Star listed.

After the 4/6 teleconference, we contacted our manufacturing members with the following questions:

Will the new testing requirements presented by Energy Star during the 4/6/10 teleconference --

- A.   1   not change your interest/involvement in ENERGY STAR, and you will continue to submit the same number of fixtures for qualification as ENERGY STAR going forward
- B.   6   cause you to limit the number of fixtures you submit for re-qualification
- C.   9   cause you to limit the number of new products you submit to qualify for ENERGY STAR
- D.   3   cause you to end your participation in the ENERGY STAR program
- E.   0   not make a difference to our company as we are not involved in the ENERGY STAR program and have no current plans for future involvement

More than 10% of our manufacturers responded (the numbers indicate the tabulated responses to a particular question). Some responded only with comments.

All of the responding manufacturers have a significant presence in the market and all but one currently serve the market with Energy Star residential lighting products. Several of the manufacturers have sent you additional comments directly.

The responses indicate that ALA manufacturers will substantially reduce or eliminate their participation in the residential Energy Star Lighting Program if expensive and burdensome testing requirements are implemented especially, if in the view of the manufacturers, the additional testing provides little or no useful marketing or application information to the consumer, the retailer or the manufacturer. An example of such unneeded information would be luminaire photometric data for decorative luminaires.

Similarly, adding the burden and costs of multiple ongoing laboratory tests per year for lighting products which can be judged to be energy efficient via a photograph or visual inspection of the lamp socket has not been justified by the value of the resulting data that would be provided.

Mr. Michael R. Campbell, Vice President Engineering of Hubbell Lighting Inc., an ALA member, added in his response to us:

"Today it is not uncommon for Hubbell Lighting to incur 3rd party laboratory costs of \$1500-\$3000 to qualify our LED products. Worse, as LED products have continued to proliferate we have seen continued problems with lab availability and increased price pressures. If the EPA does in-fact expand this protocol to all lighting fixtures as proposed, we would expect to see even further delays in getting products tested at ever increasing prices. In turn at some point it should be expected such increased development costs will result in higher consumer prices."

"The proposal calls for twice yearly rounds of verification testing of products already in production. The last such 3rd party verification we went through at Hubbell cost nearly \$8,000 in lab fees. With nearly 50 Energy Star fixtures in just our residential lighting lineup, this proposed verification testing provision has the potential to becoming prohibitively expensive. Additionally as proposed a failure in one of these tests would require a manufacturer to change model number to get the product re-listed, even though the failure may only be an isolated batch issue. While it is acceptable to hold manufacturers responsible for performance issues, we believe the proposal to change model numbers is going way deeper into our business practices than necessary."

While the stated objective of the Energy Star Lighting Program has been to be "technology neutral", the ALA now questions this approach. The testing proposals, as we understand them, are written to quantify the performance of LED products. This is a "worst case" situation because there are significant technical differences between CFL (and other fluorescent) lamps and lighting systems and the lamps and systems which utilize LEDs. For one, the changes expected in efficacy, life, light output and color of CFLs are known and can be modeled whereas there is limited experience with changes in LED-powered lighting products and those changes cannot yet be modeled or, indeed, have not yet been completely measured against accepted standards.

Our view is that Energy Star testing and verification requirements should be sensitive to the characteristics of the light sources and systems being used – one size does not fit all.

Sincerely,



Terry McGowan