

April 22, 2010

To: ENERGYSTARVerificationProgram@energystar.gov

Subject: Comments to ENERGY STAR® Products Enhanced Testing and Verification: Lighting Products

From: The Aurora International Testing Laboratory

The Aurora International testing Laboratory (AITL) appreciates the opportunity to provide comments to the proposal laid forth regarding the ENERGY STAR Enhanced Testing and verification: Lighting Products program.

AITL has a long history as an accredited test lab to the NVLAP Energy Efficient Lighting Program. AITL has provided Energy Star qualification testing services to numerous manufacturers seeking to qualify their products in the CFL, RLF, SSL luminaire and SSL integral products program. In addition AITL has been active a lab providing EPA QA-4 testing services. AITL is somewhat unique in that we are owned by Technical Consumer Products Inc. but are independently managed and operated. We conduct testing not only for Technical Consumer Products but, for a host of other manufacturers. Energy Star related testing is a large part of what we do here at AITL. As such AITL strongly desires to continue providing these testing services. In fact we would seek to expand our role in this arena by being available to provide all energy efficient lighting testing services in the Enhanced Testing and Verification Program, both qualification and verification testing of all lighting product categories.

Comments:

- AITL is of the view that all testing done in these programs shall be done by accredited test laboratories with the appropriate test method standards in their scope of accreditation.
- Retain the practice that allows either independent or manufacturer's accredited test laboratories to conduct qualification testing. This has worked well for the lighting programs while limiting cost to manufacturers.
- The final version of your testing specifications should contain a definition section that clearly describes what is meant by accredited laboratory, independent laboratory, manufacturers; laboratory and third party laboratory. Our opinion is that the terms are being used in a manner that is not thoroughly clear.

- Consider that value added by having test laboratories submit test reports for qualification directly to Energy Star. This has not been universally done in the lighting programs and may represent an unnecessary shift in responsibilities and resources from manufacturers to test laboratories.

Again thank you for the opportunity to comment.

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