
From: Curt Brownlee [Curt@brownlee.com]
Sent: Thursday, April 29, 2010 4:43 PM
To: ENERGYSTARVerificationProgram@energystar.gov
Cc: Steve Landreneau; Jim Shaffer; Tom Brownlee
Subject: Response to new Proposal

To Whom It May Concern:

Below is our response to the new proposed Energy Star verification process for Lighting Fixtures. Explained below is our current process for qualifying fixtures and how the new process will affect us. We are not in favor of this proposal and feel it will definitely affect the amount of fixtures we will be able to put into the market. Please acknowledge that you received this email.

During the previous two conference calls, the procedure discussed for the current method of qualifying light fixtures has been incorrect. As it stands this is the process for qualifying fixtures for ENERGY STAR:

1. We choose a lamp and ballast from the approved matrix for our fixture.
2. A heat test is conducted to determine the case temperature during standard operation. Tests are done in house in a calibrated lab. Tests are also performed on the worst case fixture for each wattage. This allows submission of multiple fixtures with one test per ballast/lamp combination.
3. We then fill in the QPI form with all the information that is required. Currently, the 4.2 QPI form requires only the heat test data.
4. Forms are submitted, and generally approval is granted within 4-6 weeks.

We do not use a third party for testing of the fixture, since the heat test only requires a standard calibration.

We have received a notice to have one of our fixtures verified through the Quality Assurance procedure. There are 7 areas that are required for testing, which are the same areas that are proposed in the new testing procedure.

1. Efficacy – This is a function of the ballast/lamp combination.
2. Lamp base type – Based on ANSI or IEC specifications, and produced by the lamp manufacturer.
3. Lamp Start Time – Specification set by ENERGY STAR, and the lamp manufacturer must meet it for listing.
4. CRI - Specification set by ENERGY STAR, and the lamp manufacturer must meet it for listing.
5. Lumen Maintenance - Specification set by ENERGY STAR, and the lamp manufacturer must meet it for listing.
6. Max Case Temperature during operation – Directly related to fixture design.

It has been stated on multiple occasions that the proposal for the qualification procedure is to be the same as the verification procedure. As noted, the light fixture manufacturers only have control over one aspect of the testing. The other characteristics are functions of the lamp and/or ballast manufacturers.

It seems that the new requirements would be detrimental to the fixture manufacturers and our ability to qualify, and offer, ENERGY STAR rated products, based on the following:

1. The QA procedure costs \$4500 per fixture. In order to qualify a new product, the cost of testing would be equivalent. This will lead to fewer products submitted.
2. If a fixture fails any test other than the case temperature, there is nothing the fixture manufacturer can do to pass the test other than get a new lamp or ballast. We are limited to using the products that are listed on the NEMA/ ALA matrices, which are supposed to be pre-qualified by ENERGY STAR.

Brownlee Lighting currently has over 1000 products qualified. If the new procedures had been used, the cost of qualification would run over \$4.5 million, which is prohibitive, and sales do not justify the expense.

The main problem appears to be the confusion of mixing the lamp manufacturer with the lamp fixture manufacturer. Lamp fixtures can only be built using approved products, and are totally dependent on the technology used by the component originators. If the new procedures are put in place, and the proposed re-testing of existing fixtures is implemented, it will result in many companies voluntarily disassociating themselves from the program due to the increased financial concerns. I strongly urge the continuation of the current qualification procedure, and refining the verification procedure to include only those properties that light fixture manufacturers can control.

Thanks for your consideration,

Curtis M. Brownlee
President
Brownlee Lighting
407.297.3677
www.brownlee.com



Go Green: Please do not print this e-mail unless necessary.