

---

**From:** Steve Landreneau [SteveL@brownlee.com]  
**Sent:** Tuesday, April 06, 2010 2:39 PM  
**To:** ENERGYSTARVerificationProgram@energystar.gov  
**Subject:** ENERGY STAR Enhanced Testing & Verification Stakeholder Call: Lighting Products  
**Attachments:** image001.gif

Kathleen,

I'm not sure that all aspects of the current qualification process for CFL's are being considered. Currently, we select a lamp and ballast from the approved matrices, and we build a fixture utilizing the approved components. The only test that is required by the ENERGY STAR 4.2 QPI form is a ballast case temperature test. Also, we are only required to test the worst case fixture for each wattage. If the program follows through with requiring a third party test for each fixture to be tested and listed, the expense will be enormous, as we currently have over 1000 products qualified.

We received a verification request this year for one of our products. This request requires that our ENERGY STAR listed fixture be tested for 6 performance characteristics, of which, we have control over exactly 1 item. We do not produce the lamp or the ballast, yet our fixture is being tested for CCT, CRI, lumen maintenance, and lamp start time. If the fixture fails one of those requirements, our product will be de-listed, when we were using product the ENERGY STAR program told us we had to use.

If, when we attempt to qualify a new product, the lamp start time is out of specification, exactly how do we, as a fixture manufacturer, rectify the problem with the lamp, short of replacing the lamp? I believe more attention needs to be paid to the actual process currently used to qualify LIGHTING FIXTURES, because the discussion on the conference call did not take in to account the present process.

Steve Landreneau  
Product Engineering  
(407) 297-3677 x3002  
[stevel@brownlee.com](mailto:stevel@brownlee.com)