

NEW LIANG HSIN INDUSTRIAL CO.,LTD

To: Energy Star

Date: April, 16th, 2010

Subject : Immediate Changes to ENERGY STAR Product Qualification Procedures

Dear Sir,

We are a residential light fixtures manufacturer in China, our different customers have the different requirements for the wattage or q'ty of Energy Star electronic parts . And the different customers ask us use the different brands of Energy Star electronic parts. Caused of that, each model of our fixtures could be matched with several or decades types of wattage or q'ty of Energy Star electronic parts in different brands to meet with the requirements from the different customers.

Energy Star regulates that the manufacturer should submit the testing report for each combination if the fixture may match with the different wattage, q'ty or brand of Energy Star parts. That is to say, we need submit several or decades testing reports to get the Energy Star qualified for any model. Kristina from Energy Star ever advised us: "If you are using ENERGY STAR approved platform or GU24 lamp, the only test we require at the time of submittal for indoor fixtures is maximum measured ballast case temperature test. This particular test may be performed by the fixture manufacturer."

We received a letter from Energy Star yesterday, it says: By the end of the year, all products will be subject to qualification testing in EPA-approved, accredited labs. As our understanding, several thousands testing charge will be involved for each combination of each model if all products must be subject to qualification testing in EPA-approved, accredited labs. If so, Energy Star qualification charge will become a big cost for us, and it will definitely decrease our and our customer's interest to get the products qualification. Therefore, we wish that the lighting fixture manufacturer could still provide a self-tested lab report to get the qualification. We have other reasons as below:

- 1. All of our fixtures are UL&CUL listed, the safety of the fixtures has been ensured.**
- 2. The electronic parts we used are all with ENERGY STAR approved platform, the efficiency has been ensured.**
- 3. This will indirectly encourage the manufacture set up own lab, so the manufacturer has the ability to perform the safety testing for all of their products, not only for Energy Star qualified products.**

If EPA concerns the manufacturers will submit the falsify information, EPA can enhance the checking range and increase the punishment for any failed testing. We do not think it is the best way to solve the current problem by changing to accredited labs. We have already heard from many manufacturers and customers, ENERGY STAR has already increased the production cost. Now, the testing charge will be added, it is very hard to figure out ENERGY STAR help to reduce the energy charge or do increase the production cost.

In current market, individuation demands are more and more, it creates the products with more designs and less q'ty. If the manufacturers need invest high cost to get ENERGY STAR qualified for these products and designs with less q'ty, it will embarrass the beautiful will to promote and develop the ENERGY STAR.

Above is our comments for the new changes, we wish EPA can reconsider if it is good for ENERGY STAR development to have qualification testing in EPA-approved, accredited labs, instead of the self-tested lab. Thanks a lot.

Best regards.

Angela