
From: Frank Wysaski [fwysaski@led-llc.com]
Sent: Wednesday, March 31, 2010 9:12 AM
To: ENERGYSTARVerificationProgram@energystar.gov
Subject: SSL Bulb Certification

We are a small business. Upon reading the requirements for Energy Star certification for SSL bulbs the cost is onerous and definitely slanted towards large companies, esp Legacy light bulb companies which can do their own certification once their inhouse testing labs have been "certified." Here is an example of what I mean by onerous: it will cost at least \$4500 per bulb to get it certified for Energy Star from one of the prescribed labs in the US. On top of that it requires submission of 28 samples which can add an additional \$170 to \$8000 (at our cost) to the cost of the testing charge. This \$4500 plus 28 samples is for each bulb, and where a "family" has 3 different beam patterns and two different colors (CCT) this is multiplied by 6. I certainly understand the need for "adequate" certification process, but this is totally unreasonable for small companies and puts us at a distinct disadvantage against the Legacy companies, who probably are sitting on the sidelines and just waiting for the collapse of the competition, not to mention the fact that 2 of the Legacy companies already took their own path toward some certification in the SSL marketplace by counterfeiting the Lighting Facts labels. We need your help to level this playing field.

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