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Sent: Wednesday, April 07, 2010 10:16 AM
To: ENERGYSTARVerificationProgram@energystar.gov
Subject: Stakeholder Comments on Energy Star for SSL

I think the webinars are a great way to update us on pending issues but also a worthwhile method to get instant feedback from stakeholders who definitely will be affected by the pending issues. Light Emitting Designs is a small company that is enjoying success in the burgeoning SSL market. We fully subscribe to the principles of quality in our products and support the existing labeling agenda of Lighting Facts. But because we are a small company we do not enjoy the resources of the Legacy light bulb companies (Osram, Sylvania, GE) nor do we have an in-house certification lab that could offset Third Party testing expenses.

Your proposed requirements for Third Party certification and potentially Third Party Verification can be onerous for small companies. For ex: I have been quoted \$4500 by INTERTEK to certify ONE SSL product, plus I have to provide 28 samples for the actual testing. Full testing will take 9 months. If a family of product has 3 different beam patterns + 2 different CCTs this will mean 6 x \$4500 plus the cost of 28 samples for EACH SKU for a potential expense of \$27000 + samples (easily another \$3000 to \$10000 depending on cost of samples). AND THIS IS ONLY FOR ONE BULB FAMILY!!!! And whenever our products might be selected for verification this cost continues to rise. (All of these costs and quants are from the latest Energy Star Program Requirements for Integral LED Lamps Final 12/3/09).

I believe the key to expanding customer acceptance of SSL products hinges on providing quality products AT AFFORDABLE PRICES. Burdening small companies with the huge expense of certifying and verifying simply escalates our costs which must be passed on to our customers and puts us at a decided disadvantage to the Legacy companies when we have to spread these expenses over a much smaller sales base. If this playing field cannot be leveled to an acceptable degree, the market's requirement for Energy Star labeling will effectively shut us out of this business and reduce the competition to only the bigger companies.

I suggest that the Lighting Facts program can suffice for "certification" as it offers the end user the confidence that he needs to believe in claimed performance specs. The addition of UL or ETL certification satisfies the safety concerns. Energy Star, which has traditionally encompassed the energy consumption aspect of a product, should remain concerned with true wattage and efficacy of the SSL product. If all appliances for example were Energy Star rated then there would be no need for an Energy Star program. But we know there are products out there that are not Energy Star rated and to some extent customers are willing to purchase them. So for SSL products having Lighting Facts, UL/ETL and Energy Star (for efficacy only) customers can choose which brand, which price, which warranty, etc etc that they want, and will continue to purchase based on reliable association with that product/brand.

Some other thoughts on the verification program: if there is no reason to doubt the veracity of the certification of a product, why burden the manufacturer with the cost of the verification. Possibly have a "small adder" for all certifications that goes into a pool that absorbs the cost of the verification. If the verification provides negative results, then possibly charge the manufacturer IF THE NON-VERIFICATION HOLDS UP through review and appeal. Also, how many samples of the product will be secured for verification: 1? 2? 10? Etc 28 samples of a product are required for certification per INTERTEK. How much will it cost for the full verification process? And what is the AQL standard for selecting the proper count of samples if the product sells 1000 pcs in the market vs maybe 10,000 pcs vs maybe 50,000 pcs???? Might you be suggesting greater than six sigma if you come across a bad sample in the verification process that would be extrapolated over the entire production quantity?

I do hope that you will reconsider the full Energy Star requirements for individual SSL replacement bulbs with consideration for smaller companies that do provide a service to the market and the economy, and also give some thought to reconfiguring the verification process that is fair and considerate of legitimate and quality driven providers.

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