

January 8, 2010

Alex Baker
ENERGY STAR Lighting Program Manager
US EPA

Dear Mr. Baker,

We appreciate the opportunity to comment on the "ENERGY STAR Qualified Lighting – An Integration Proposal" document.

Permlight Products Inc. wholeheartedly supports the idea of technology-neutral source-based specifications for ENERGY STAR. Additionally, we also support the concept of combining the RLF and SSL specifications for lighting fixtures into a single qualification procedure. However, we want to make sure the following issues are addressed:

-The proposal includes provisions for the short term that only "decorative" luminaires as defined by LSD 51-2009 will be able to qualify under RLF4.2. This means that those luminaires classified as "both" by the LSD 51-2009 would be excluded. Since there are no specifications for many of the products classified now as "both," these types of luminaires would be excluded for any qualification. The "both" category includes, among other types, chandeliers. We feel that if a chandelier or any luminaire light source can demonstrate the efficacy targets of RLF4.2 then it should not be excluded from qualification. Any integration plan should not exclude chandeliers or any other luminaire type that is not covered under SSL V1.1 (or V1.2).

-Rather than continuing to have separate specifications for commercial and residential lighting products as proposed. We support a single luminaire specification that has certain requirements per luminaire type. As most luminaires can be used in both commercial and residential applications, it is often difficult to discern the differences in such products. There are some luminaire properties such as high wattage, lamp type, voltage requirements or FCC class ratings that make certain luminaires more suitable to commercial than residential requirements, but many luminaires can be used in either type of applications. We feel a single luminaire specification would be much easier to digest for program Partners.

-We agree that it remains appropriate that categorization of certain products (not currently done in RLF) is going to be required in order to make any combined specification useful, and we support ALA's luminaire classifications and the DOE methodology for certain classes of fixtures so far.

Thank you for allowing us to submit these comments, and we look forward to your consideration.

Warm regards,

Michael Bremser, Chief Technology Officer
Permlight Products, Inc.

Chris Primous, Dir. of Sales/Business Dev
Permlight Products, Inc. - Brillia LED

