

Philips Lighting

**Washington Industry and Government
Affairs**
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Subject: Integration Proposal for Energy Star
Qualified Lighting

Date: January 5, 2010

Philips would like to take this opportunity to thank you for allowing us to provide input on the proposed framework for the integration of Energy Star lighting product programs. We also fully endorse the commitment to clarifying roles and responsibilities and establishing a new coordination mechanism.

We also fully endorse the need for the Energy Star label to identify energy efficient products that offer meaningful energy savings and are concerned that some of the recent proposed metrics may not adequately correlate to true energy savings. The proposed payback periods of 3-5 years need to be shortened to accelerate the pace of energy savings, though, especially in light of the current economic situation restraining capital availability for energy saving investments. Many businesses in the current situation are requiring a maximum payback period of less than one year. Also, it is not clear in the introduction what the top 25% most efficient models is based on; sales volume, sales dollars, # of models, etc.

Philips is also supportive of the need to make the proposed standards technology neutral. This will drive additional energy savings from more light sources and provide the market place additional lighting choices. As pointed out in the proposal this also must include the testing approaches in addition to the specifications.

Philips is also in full agreement with a specification revision process that is open and transparent. This is the approach the DOE has generally taken in the development of the SSL Energy Star specifications which has been greatly appreciated by industry.

The proposal for the DOE to complete the SSL Energy Star specifications that are in progress makes complete sense considering the amount of work that has already gone into these specifications and how close they are to completion.

Although a lot of work went into the referenced NEMA/ALA document that tries to discern differences between functional and decorative lighting, it still has many fixtures that fall into both categories. Until this document can be further refined it should not be the basis for establishing a criteria to determine which Energy Star specification should be used for which fixture. This current proposal provides a loophole that will allow some fixtures to be labeled as decorative in order to meet

Date: January 5, 2010

Page: 2

lower standards than functional fixtures and defeat the purpose of energy savings through Energy Star labeling. It would be best not to have an Energy Star rating for decorative fixtures.

Philips is also very supportive of verification testing to insure products are in compliance with Energy Star that are so labeled. But this does not mean that the CALiPER program is the solution. CALiPER was designed to provide guidance on SSL technology and trends, not necessarily to insure compliance to existing specifications (which in many cases do not exist for SSL products). At the same time, we disagree with the following statement with respect to PEARL on page 7 of the Integration Proposal: "Sponsors of this program [PEARL] have in recent years voiced a strong preference to see this program sunset in favor of government-run, manufacturer-funded verification testing programs." On the contrary, Philips has been lobbying the DOE and now the EPA to look instead toward more manufacturer partnership-type programs wherein the onus is on accredited fixture, LED and driver/PSU manufacturers to perform the required testing and verification, and then provide required documentation to a recognized oversight group such as the federal government (or a representative thereof such as PNNL), UL, ETL or an accredited lab. This provides greater flexibility in product design, increases time to market and enables more manageable expenses for manufacturers. For reference see the recent enhancements to the Oct 2009 ENERGY STAR Manufacturer's Guide Version 2.0.

Regarding the label, we believe a uniform approach needs to be taken to inform consumers how to choose the appropriate lighting for their specific needs. This needs to be coordinated between Energy Star and the FTC who has been mandated to establish labels for general service lighting by the Energy Independence and Security Act of 2007. It also needs to include input from manufacturers who have extensive history of understanding what influences consumer buying decisions.

In closing, Philips again expresses its thanks for this opportunity to provide input. We look for to working closely with the EPA and DOE on this integration plan and future specification.