

**From:** [David Shiller](#)  
**To:** [ENERGYSTARVerificationProgram@energystar.gov](mailto:ENERGYSTARVerificationProgram@energystar.gov);  
**cc:** ["Greg Murphy"](#);  
**Subject:** Formal comments from MaxLite  
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Hello. MaxLite is not able to determine how the proposed draft lab requirements will affect the current E\* RLF program (V4.2) and proposed new luminaire specification (V1.0). Currently, some tests, such as the "heat test" can be performed by fixture manufacturers. Will RLF manufacturers continue to be able to perform the heat test in house or through their ballast supplier (or GU24 lamp supplier)?

Raising the bar on lighting testing expenditures is unacceptable given lighting manufacturers already bear the highest testing burden in the E\* program, both for qualification and QA4.

Thank you for considering these comments,  
David

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