

December 2, 2010

Alex Baker
ENERGY STAR® Lighting Program Manager
U.S. Environmental Protection Agency
1310 L Street NW
Washington, DC 20005

Subject: ENERGY STAR Integral Lamp Letter of November 15, 2010

Dear Mr. Baker:

On behalf of Cree, Inc., Philips Electronics North America Corp., The Home Depot, Lighting Science Group, Inc., Next Generation Lighting Industry Alliance, Alliance to Save Energy and Southeast Energy Efficiency Alliance, thank you for the opportunity to comment on the proposed change to eliminate the “non-standard” lamp category from the ENERGY STAR Integral Lamp specification.

Through EPA’s leadership over the years, the ENERGY STAR program has provided, and continues to provide, recognized value to energy efficiency and a trusted brand in several important consumer product segments. The nascent Solid State Lighting segment is no exception, and EPA is positioned to make an important contribution here as well.

We understand and agree with the issue of unmet customer performance expectations that EPA is trying to address with the proposed elimination of the non-standard lamp category. However, we ask EPA to reconsider the current proposal, and instead address the issue through additional product labeling and/or more technical specificity in the description of the light distribution.

Our basic concerns are:

- **These lamps are coming to market regardless.** This category was created nearly two years ago by the early US DOE ENERGY STAR documentation, and subsequently promulgated by EPA several times. Relying upon these specifications, many manufacturers have made investments and are now building these lamps in large quantities.
- **Retailers stand ready to support the ENERGY STAR program with this category of product.**
- **Without EPA Leadership through an ENERGY STAR metric, we expect the quality of products in this category to rapidly deteriorate.** Cost will become the primary driver for this category, and poor consumer experience is highly likely.
- **LEDs offer product designers great flexibility to create unique products not possible with traditional lighting.** Removing this important designation will discourage innovation in design.

We think the overall risk of poor customer experience with these expected low-quality non-standard lamps is much higher than the potential risk of poor customer experience due to the light distribution issue that is driving this proposed change. We also feel that the light distribution issue can be addressed through packaging, labeling and merchandising options rather than elimination of the entire category.

We would be happy to work with EPA on the technical and labeling issues cited above, toward the mutual goal of saving energy and providing high-quality product to the consuming public.

Sincerely,

Greg Merritt
Vice President
Cree, Inc.

Randall Moorhead
Vice President
Philips Electronics North America

Bill Hamilton
Merchandising Vice President
The Home Depot

Zach Gibler
Chairman and CEO
Lighting Science Group

Keith Cook
Chairman, *on behalf of*
Next Generation Lighting Industry Alliance

Jeff Harris
Vice President - Programs
Alliance to Save Energy

Ben Taube
Executive Director
Southeast Energy Efficiency Alliance