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Dear Alex Baker:

GE is submitting the following comments on the EPA letter, "Integral LED Non-standard Lamp labeling proposal". GE is concerned that LED lamps that mimic and copy standard ANSI shapes but cannot meet the Energy Star photometric performance requirements will confuse the consumer and lower expectations and/or adoption of the LED technology.

The proposal for additional labeling does not cover or fix the following points:

- 1) **Product performance & Consumer Confidence**– The non-standard lamps do not meet the same level of performance that the current standard lamps are expected to meet per Integral lamp spec v1.3. The Energy Star mark is **not intended** to be on products that simply use lower energy but rather meet strict performance targets, including energy efficiency, to attract consumers to adopt their use at a faster pace. The performance targets were set in multiple areas (CCT, CRI, lumens, etc), with the consumer in mind to ensure satisfaction with new technology type products, due to the fact that the average consumer does not understand these technical areas and expects a certain level of performance based on previous experiences.

Based on GE consumer focus groups and other discussions with consumers, the non-standard lamp is considered inferior and confuses or tricks the customer into believing a certain performance based on the overall shape and marketing of the product. It is important to note that consumers do correlate the shape of a "bulb" or "lamp" to a certain level of performance. Consumers will purchase non-standard LED lamps based on the known quality of Energy Star products but find inferior or different performance than the lamp shape they are looking to replace.

- 2) **Price versus performance**: The performance that the current Energy Star standard lamps achieve is not done at no-cost or "free" but rather at a significant design or manufacturing cost. This difference in cost can be a disadvantage to true replacement lamps in the market place that meet or exceed the energy star specifications.

As shown in Caliper round 11, there are significant issues with current LED lamps, most in the non-standard lamp category, meeting the claims specified or implied on packaging. The lamps tested as a part of round 11, especially in the Omni-directional category; show that these products cannot meet the performance criteria for this type of standard lamp. Allowing these types of products to receive Energy Star certification would only further confuse and alienate consumers by associating these types of product with the known and trusted Energy Star mark. There is a process by which the non-standard lamps can become a standardized and receive a proper ANSI designation. This process allows for the standardization of mechanical, electrical and photometric properties for a new "lamp". If these non-standard lamps have true value to the market it should go through this process so that it can be effectively described and performance expectations can be determined and agreed upon.

GE has a history of supporting the Energy Star program and truly believes in its overall message and mission. Accordingly, GE would not want to entertain situations that would devalue it in any way. GE proposes that if the market truly wants a non-standard lamp category that research is done on what the true performance metrics need to be with the understanding that making a cheaper version that only meets minimum performance characteristics is not a high quality LED lamp that should be associated with the Energy Star program. GE recommends that there not be a non-standard lamp category until the above criteria can be determined and that simple changes to labeling will only serve to confuse consumers.

Thank you for allowing us to voice our concern regarding this topic. If you have any questions regarding the comments please feel free to contact me for further discussion or clarification.

Sincerely,

Steve Briggs

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