



GE Lighting
1975 Noble Road, Building 335C
Cleveland, Ohio 44112

via e-mail

January 14, 2011

Mr. Alex Baker
Lighting Program Manager, ENERGY STAR
US Environmental Protection Agency
Washington, DC 20460

Subject: ENERGY STAR Luminaires V1.0 Final Draft Comments

Dear Mr. Baker:

GE Lighting is pleased to provide the attached comment on the v1.0 draft of the ENERGY STAR Luminaires specification.

Sincerely,

A handwritten signature in black ink that reads "Anthony Serres" followed by a horizontal line.

Anthony Serres, LC
Fluorescent Systems Engineer

Response to ENERGY STAR Program Requirements for Luminaires, v1.0 final draft
issued 12/20/10

In addition to the comments submitted through NEMA, General Electric would like to offer the following additional comments.

In the list of RoHS exemptions that appear on page 43, item 7 reads: "Lead in glass of fluorescent tubes not exceeding 0.2% by weight." We suggest that the language be changed to "Lead in glass of fluorescent tubes."

The existing language mirrors that of a change recently adopted in the EU. While lamps intended for the European market need to meet this requirement, the only similar requirement in the US is the California Lighting Efficiency and Toxics Reduction Act. This Act follows the original EU RoHS exemptions, not the recent changes. The proposed change takes its language from the original EU exemptions and thus would be consistent with the California requirements.