



As an Energy Star partner, TCP would like to submit the following comments regarding the third draft of the new Energy Star Specification:

TCP feels many of the additions/changes to the 2004 spec will be valuable in improving the ENERGY STAR program overall. We are especially pleased to see the 40% early labeling requirement, as well as the use of standard equivalency charts. We do, however, have some concerns with other parts of the specification. Comments/concerns follow:

The new specification requires that partners “Financially contribute to an Energy Star-approved independent third-party verification and testing program”. Although not our first choice, TCP agrees that this would be an acceptable alternative. However, the provisions and rules governing this program, and the publishing of data, must be agreed upon - with manufacturers’ input- far in advance of the new spec taking effect.

The language has been rewritten as to how unit shipment data is to be submitted, but there are still concerns over how requests for data/information will be handled which are requested under the Freedom of Information Act. TCP requests clarification on how such requests will be handled.

TCP would like to see the bare lamp efficacy requirements for bulbs under 15watts raised to 60 Lumens per watt.

Also, run-up time should be split between bare lamps and covered lamps. Bare lamps should be less than 60 seconds. Covered lamps should be less than 120 seconds. Consumers do not like the slow run-up times and this is still a barrier to widespread acceptance in the market.

TCP is pleased to see the use of equivalency charts in the new spec. However, there has to be a separate floodlight equivalency chart. One cannot use the A-Lamp chart for floodlights; it is not fair to the consumer.

New language has been added requiring a “product failure report” if 2 samples of a lumen maintenance set were to fail before 40% of life. TCP would like to request clarification on this point. What type of report is being requested? What level of detail?

We believe Initial Qualification at 40% of life is good for the ENERGY STAR program. However, this requirement eliminates the need for testing at 1000 hours. A lamp not meeting 90% at 1K will not meet 80% at 40% of life. This extra step is unnecessary, lengthens the time to finish the test and is costly to the manufacturer. We don’t believe that there is value in testing at 1000 hours and would like to see the 1000 hour lumen maintenance testing requirement dropped.

We believe the CCT temperature ranges must be given additional consideration. Implementing the categories as proposed will confuse rather than educate the public. Consumers are unfamiliar with the Kelvin scale. The number on the package describing the temperature means nothing. Narrowing categories down to 200 degrees and giving them different names will prove difficult and hard to distinguish for the average consumer. Labeling a lamp in the 2900 to 3099 warm white will be doing

the public a disservice. Also, will there be any requirements of where the text and number are to be displayed? What if there are already other color descriptors on the package that do not coincide with the proposed categories?

Instead, we would like to suggest the following categories:

Kelvin	Description
<2700K	Warm White
2700-2899	Soft White
2900-3099	Bright White
3100-3500	White
4199-5000	Cool White
5001-5999	Sunlight
6000 +	Daylight

Lastly, under the heading “Product De-listing/Disqualification Procedure:” the statement, “E-mail announcement will be distributed on an “as needed” basis to alert partners to changes in CFL model’s ENERGY STAR qualification status” is extremely vague. We request clarification as to what situations/circumstances constitute “as needed”. Also, what “REPS” are included in this notification?