



Department of Energy
Washington, DC 20585

August 26, 2003

ENERGY STAR Partners:

Attached for your review and comment is the third and final draft revision of the ENERGY STAR Criteria for CFLs (Version 3.0). Comments on this draft version are due by **September 19, 2003**. This revision was developed from the April 15, 2003 version and has incorporated partner and stakeholder feedback from the 2nd comment period as well as the ENERGY STAR CFL Criteria Meeting that was held in April 2003.

The submitted comments provided excellent suggestions and guidance on a number of important criteria issues, specifically on reflectors, correlated color temperature, lumen maintenance requirements, shipment data submission, product packaging, and the effective date of the new criteria. Many of the suggestions have been incorporated into this third revision. The chart below reviews the specific topics or issues that were submitted, along with commentary on their status:

| Suggested Topics or Issues | Commentary |
|--|---|
| Efficacy Requirements | Current requirement has not changed in draft Version 3.0. The efficacy requirements will be the prime area of discussion during the next criteria revision. |
| 3% Tolerance for Efficacy and Lumen Maintenance Requirements | Clarified how the -3% tolerance should be calculated; the -3% is only applicable to the efficacy, 1,000-hour lumen maintenance and 40% lumen maintenance of rated lifetime requirements and only applied to the measured lumen output. |
| Niche Colored Lamps | This suggested requirement will not be added to the criteria at this time. It may be considered during the next criteria revision. |
| Electromagnetic Interference/ Incompatibility with Controls | Updated requirement in draft Version 3.0 to <i>Compliance with FCC 47 CFR including Part 2 (Equipment Authorization) and Part 18 (Technical Standards and Emission Limits) for consumer RF Lighting equipment.</i> |
| Correlated Color Temperature (CCT) | Current requirement has been revised to offer defined CCT ranges with corresponding descriptive labels (i.e. - cool white/warm white/daylight). For labeling products with the CCT, partners will be required to round their CCT average to the nearest 50 K. In addition, CFL models that are available in CCT ranges (i.e. one model that is available in 2700K, 4100K, and 5000K) must be individually tested for ENERGY STAR qualification. Incorporation of the CIE 31 x and y chromaticity requirement for CCT will be researched and discussed when more information has been collected. |
| Shipment Data Submission | Updated requirements in draft Version 3.0 to have the data submission deadlines on February 15 and August 15 . |
| Run-up Time/Start-up Time | Current requirement has not changed in draft Version 3.0. The run-up time requirement will be discussed during the next criteria revision. |
| Warranty | Updated requirement in draft Version 3.0 to offer warranty or limited warranty for residential and commercial use applications. |
| Required Disclaimer for CFL Guarantee/ Lifetime Claims for Residential Use | In draft Version 3.0, added requirement for CFL lifetime claims – the requirement is based on normal residential use of 4 hours per day. |
| Retirement of Products/ Disqualification of Products | In draft Version 3.0, incorporated three categories to identify products on the qualified product list: Qualified, Disqualified, and Retired . The meaning of a Retired Product is: "A product that was properly qualified as ENERGY STAR, but is no longer manufactured (as of the date on the list), but may still be available in the market". |

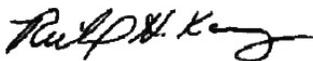
| Suggested Topic/Issues | Commentary |
|--|---|
| Transient Testing | In draft Version 3.0, updated and corrected the IEEE Standard reference to IEEE C62.41-1991 (01-May-1991) and incorporated "self-certification" for testing requirement. |
| Testing Dimmable CFLs | Enhancing the testing requirements for dimmable CFLs has not been incorporated into draft Version 3.0. Review of the dimmable test procedure and minimum-dimming range will be discussed during the next revision. |
| Candelabra-base Lamps | Candelabra based lamps are not included in draft Version 3.0. The program will continue to work with partners to review the performance of this product type and will consider developing appropriate criteria, if needed, in version 4.0. |
| Reflector CFLs | At this time, DOE believes the new requirement to initially qualify a product as ENERGY STAR at 40% of rated life will control and prohibit poor performing reflectors to be introduced into the market as an ENERGY STAR product. In addition, DOE will continue to review alternative testing procedures to consider creating a more stringent testing requirement for this product type. |
| Interim & Final Lifetime Tests/Lumen Maintenance Sample Requirements | Clarified in draft Version 3.0 partners must use a single sample set of lamps for both the lifetime (both interim & final) and lumen maintenance tests. In addition, if a product has 2 failures during the interim lifetime test, partners are required to submit a product failure report from an accredited laboratory to ENERGY STAR to provide clarification on why the products failed. |
| Packaging Requirements | Incorporated additional packaging requirements (i.e. - standardized CFL lifetime claims; application exceptions, etc.) to aid consumers in selecting the best ENERGY STAR qualified CFL for their specific use. |
| Equivalency Criteria for Reflector/Globe CFLs | Additional incandescent equivalency charts for globes and reflectors products will be researched and discussed for Version 4.0. |
| Criteria Standard Operating Procedures (SOP) | DOE will develop a Standard Operating Procedure (SOP) of specific pass/fail/follow-up decision rule criteria for key requirements by the effective date of criteria Version 3.0. |
| Effective Date of Version 3.0 | Effective Date will be January 1, 2004 instead of November 1, 2003. |
| Required Third-Party Testing Program Participation | Incorporated a program requirement that all ENERGY STAR CFL program participants are required to financially contribute to an approved independent third-party verification and testing program. |

In addition, to aid in the transition to the new ENERGY STAR Criteria for CFLs, the U.S. Department of Energy (DOE) is instituting a deadline of **October 31, 2003** for partners who wish to qualify new CFL products per the existing criteria (dated 8/9/01). Partners must submit the initial test reports by October 31, 2003 or they will have to hold new product submissions until **January 1, 2004**. No new product submissions will be accepted after October 31, 2003 to qualify against the 8/9/01 criteria.

On January 1, 2004, all partners can submit new products for qualification per the Version 3.0 criteria. Partners who have qualified products in-process (based on the 8/9/01 CFL criteria) and have outstanding test data due are still required to submit the interim and final test reports, based on issued due dates they received in their initial ENERGY STAR qualification letter. Any partner who fails to submit the required test data for specific product(s) will have their product(s) immediately removed from the qualified product list for failure to complete the full qualification process.

Again, please provide comments by **September 19, 2003** to Richard Karney at Richard.Karney@ee.doe.gov and cc: Ron Lewis at Ronald.lewis@ee.doe.gov and Susan Gardner at sgardner@drintl.com. Thank you again for your continued support and active participation in the criteria revision process.

Sincerely,



Richard H. Karney, P.E.
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