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November 7, 2008

Mr. Alex Baker  
ENERGY STAR Lighting Program Manager  
US EPA

Sent via e-mail to: [baker.alex@epa.gov](mailto:baker.alex@epa.gov)

**Subject: ALA Comments on EPA/ENERGY STAR Letter of September 22, 2008 regarding changes to RLF V4.2.**

Dear Mr. Baker:

American Lighting Association members have been part of the EPA/ENERGY STAR program for residential light fixtures now for more than 10 years. We have found it to be a valuable addition to our manufacturer and retailer marketing programs which seek to promote energy efficient residential/decorative lighting to our customers who are increasingly energy aware. We appreciate both the leadership and support of ENERGY STAR to make the fixture qualification process fast, simple and efficient as lighting technology changes. We look forward to further increases in the sale and use of ENERGY STAR qualified residential light fixtures.

In response to your letter of September 22, 2008, we have the following comments:

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EPA received numerous comments expressing concern about the potential for qualification of fixtures employing high CCT LED light engines (i.e. > 3500 Kelvin), along with requests to limit those CCT values which would be allowable for qualification. Concern was also expressed about EPA monitoring of products seeking qualification to ensure appropriate CCT values.

Comment: The ALA feels that approving a wide range of light source chromaticities – especially above 3500K will confuse and frustrate residential consumers who overwhelmingly wish to have warm "residential like" light sources. Perhaps, in time, as consumers begin to understand light source chromaticity choices and learn to apply them, this situation might change; but allowing multiple chromaticity choices as consumers switch to CFL and other efficient light sources for their general lighting is needlessly confusing at this point.

As with CCT requirements, there is no precedent within the RLF program for placing restrictions on light output values acceptable for qualification. EPA received many requests to restrict Partners to specific minimum light output values by fixture application. No proposed values were received.

Comment: In general, there is such a broad range of lumen requirements for the wide range of residential/decorative fixtures that the ALA sees no value in establishing minimum light output requirements. While residential/decorative light fixtures have traditionally been designed to use incandescent lamps of 60 watts and above, fixtures with exposed lamps often use decorative lamps of 15, 25 or 40 watts. Decorative fixtures and especially those perhaps better described as luminous objects may use a wide range of lamps starting as low as 6-7 watts.

*This element of the program's design was intended to allow consumers a pathway towards energy efficiency whether shopping for a bright torchiere to illuminate a whole room, or a decorative accent table lamp for the corner of an office. Program Partners are allowed the freedom to design and qualify fixtures based on market demand. See Proposed Next Steps, below.*

Comment: This is a key point. ALA manufacturers and retailers have greatly appreciated the design freedom to offer a variety of ENERGY STAR fixtures with light outputs matched to customer requirements utilizing the full range of efficient light sources.

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*Recommendations for Testing and Evaluating White LED Light Engines and Integrated LED Lamps Used in Decorative Lighting Luminaires. EPA will be an active participant in this development process and will include the outcome of this process in updates to the RLF program as appropriate.*

Comment: Standard test procedures are critical to the ENERGY STAR program. Many ALA members are also IESNA members and actively participate in the development of industry standards such as the LM-79 or LM-80.

### **Conflicting Specifications / Market Confusion**

Concerns were expressed about potentially overlapping program scope between the ENERGY STAR RLF and SSL programs, and the potential for market confusion.

Comment: Conflicting or overlapping program scopes are a problem for ALA manufacturers. We agree that they cause market confusion. The ALA believes that such problems should be resolved promptly by the agencies involved. We and our customers view ENERGY STAR as one program and ALA members expect one set of agreed-upon rules and procedures.

#### **Program Scope**

Some comments acknowledge the history and success of the RLF program (est. 1997) and the limitation of the program's scope to only the residential segment of the broader lighting industry.

Comment: ALA members have taken advantage of the ENERGY STAR Residential Light Fixture Program from its inception. One of the reasons is that it easily includes all types of residential/decorative fixtures. That inclusiveness should be maintained no matter what type of efficient light source is used.

#### **RLF Program Precedent**

Support was received from manufacturing Partners wishing to continue working with the same ENERGY STAR program, contacts, practices and procedures with which they're accustomed and with which they have achieved success marketing energy efficient lighting products. Many manufacturers who provided these comments have been Partners with EPA since the Green Lights program (1992), predecessor to the ENERGY STAR RLF program.

Comment: ALA members require a fast, efficient process for qualifying fixtures. The ALA/NEMA Matrix of pre-approved lamps and ballasts was set up in response to this need. This matrix now consists of hundreds of lamps and ballasts and the process works well. Complicating any process adds time and costs to the light fixture products many of which are designed to be sold at modest prices.

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Concerns have centered on the potential qualification of high CCT, low light output fixtures, and the prevention of repeating mistakes made with early compact fluorescent technology. To allay these concerns, **EPA proposes to limit qualifiable LED light engine CCT values to 2700, 3000 and 3500 Kelvin for indoor fixtures. EPA seeks feedback on this approach.** Also, an

Comment: As above, the ALA feels that 2700-3500 K is the preferred range for residential lighting consumers – at least initially.

increasingly common design practice employs higher CCT LEDs (e.g. 4100 Kelvin) in conjunction with fixture optics and materials which shift fixture light output to warmer tones rivaling the appearance of incandescent lamps. EPA seeks input on the appropriateness of

Comment: Filtering a light source to change its natural chromaticity value from “cool” to “warm” makes no sense in the context of efficient lighting since the process involves subtractive filtering which reduces source efficacy (lumens/watt).

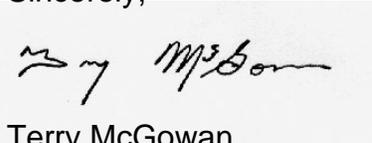
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Table 1: Proposed minimum light output requirements for LED light engines, as a starting point for Partner and stakeholder discussion.

Comment: This table seems unnecessary. Why prescribe the lumen output that should be used in fixtures? The manufacturer and consumer should do this as the manufacturer knows the market for which the fixture is being designed and the consumer knows what's wanted and needed for the specific application. Requirements may vary widely even for the same fixture. For example, a wall sconce may be used for general room illumination and require hundreds of lumens; but it may also be used as a decorative element or a bedroom night light and require a light source of only a few lumens.

Thank you for this opportunity to comment.

Sincerely,



Terry McGowan

Cc: Dick Upton