

November 4, 2008

Dear Mr. Baker,

We appreciate the opportunity to comment on the recent additions to the residential light fixture specification to allow residential fixtures using LED Light Engines to become ENERGY STAR qualified.

Permlight Products Inc. has been at the forefront of the design, development and commercial adoption of high-efficacy LED light fixtures since 2004. Our patented "Light Engine" technology has enabled us to develop some of the most cost effective and environmentally responsible products available through our network of partners' fixtures and through our recently-retired Enbryten brand of LED light fixtures. More importantly, our experience with LED products in the residential market has given us unique perspective regarding what is important for residential light fixture manufacturers in order to quickly advance the adoption of LED technology as a viable energy-efficient alternative to conventional lighting.

We wholeheartedly support the concept of continuing to allow an efficient light source to be used as a step to getting a residential light fixture ENERGY STAR qualified. This approach allows a light fixture manufacturer to use a tested high-efficacy light engine in a wide array of decorative fixtures. We feel that this is essential to rapid adoption. We are confident that LED Light Engines can be more efficacious than GU24-based CFLs (which are already being used as sources to qualify fixtures) and certainly support allowing LED technology to use similar specifications as have been used in the RLF program to date.

We are, however, concerned that we will need to work with our OEM partners through multiple specifications for various product types. Since we work with fixture manufacturers who make all types of fixtures (both functional and decorative) we are now faced with the challenge of understanding the nuances of both the SSL and RLF specifications and trying to figure out what categories are appropriate for which specification or testing procedure. The duality of the specifications is confusing to the industry and remains a concern for our company. Ideally, we would like one specification for LED-based lighting fixtures. If such harmonization is not going to happen, we would like to have one document from both agencies with a clear definition of which product types should be submitted under which spec (with a definition of each product type and how to define it).

Thank you for allowing us to submit these comments, and we look forward to hearing back from you.

Warm regards,

Michael Bremser, Chief Technology Officer
Permlight Products, Inc.

Chris Primous, Dir. of OEM Sales/Bus. Dev. – Eastern Region
Brillia LED

