

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

September 5, 2007

Dear Residential Light Fixture Manufacturer or Other Interested Party:

The Environmental Protection Agency (EPA) received several comments on the Final Draft Residential Light Fixture (RLF) Version 4.1 specification that resulted in minor changes to the proposed specification requirements. As such, EPA is providing another opportunity for stakeholders to review these changes and provide final comments **by September 19, 2007**. It is EPA's intent to finalize the specification shortly after this comment period.

Specifically, EPA is seeking comments on the following revisions to Table 3: *GU-24 Based Integrated Fluorescent Lamps*:

- Maximum Mercury Content requirements for GU-24 based lamps – previously distributed for stakeholder review on August 21<sup>st</sup>.
- Integrated GU-24 based lamp warranty of 2 years and additional packaging/labeling requirements, consistent with DOE's existing CFL program.
- Clarification on reference standards, required documentation, and test procedures cited in the specification.
- Revised efficacy requirements for integrated GU-24 based lamps, including additional allowances for dimmable, reflector, and covered lamps.

In addition, the Accelerated Life Test is now being referenced as the Accelerated Cycling, Thermal, and Voltage (ACTV) stress test. The reason for this change is that the former test name led some to question whether it was a replacement for the existing required life test. The purpose of this test is to quickly reveal inadequate circuit designs, manufacturing problems, defective materials or components, and poorly performing products. The protocol consists of higher operating temperatures (such as those experienced with enclosed fixture types) in addition to on-off cycling and high and low voltage operation. Several rounds of testing have revealed that the protocol is applicable to both ballasts and integrated GU-24 lamps.

More details regarding EPA's rationale for making these changes are included in note boxes throughout the document. Once EPA finalizes these requirements, Table 3 will be incorporated into the larger specification document. **Please note that the Version 4.1 effective date continues to be**

**August 1, 2008. Lamps demonstrated to meet Version 4.1 requirements prior to this date may be qualified.**

Stakeholders are encouraged to submit written comments on the *Revised* Final Draft specification to Evan Haines, ICF International, at [ehaines@icfi.com](mailto:ehaines@icfi.com) by **September 19, 2007**. All comments will be posted to the ENERGY STAR Product Development web site unless the submitter requests that their comments remain confidential. If you support the *Revised* Final Draft specification, please state this in writing.

To track EPA's progress revising the ENERGY STAR Version 4.1 RLF specification, visit the ENERGY STAR Product Development web site at [www.energystar.gov/productdevelopment](http://www.energystar.gov/productdevelopment) and click on "Revisions to Existing Specifications".

On behalf of EPA, I appreciate your participation in this revision process and look forward to working with you to finalize these new program requirements. If you have any questions or concerns, please feel free to contact me at [baker.alex@epa.gov](mailto:baker.alex@epa.gov) or (202) 343-9272. Thank you for your continued support of ENERGY STAR.

Respectfully,



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