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Evan Haines  
ICF International

Dear Evan,

The Aurora International Testing Laboratory is pleased to provide the following comments to the final draft of version 4.1 of the Energy Star RLF specification.

**Accelerated Life/Stress Test (ALT), table 3 page 2 of 8**

**Required Documentation:**

It is stated that replication of the LRC equipment is necessary. The specification and capability of the equipment should be specified so that test laboratories may use existing equipment or purchase other equipment brands that may be more competitively priced while still being able to conduct the tests to the specification.

**Accelerated Life/Stress Test (ALT), table 3 page 2 of 8**

**Energy Star Requirements:**

The required Method of Measurement Reference Standards requires that the Lighting Research Center (LRC) test method be used. The LRC Accelerated Life Testing – Final Report, dated November 6, 2006, states that the ALT testing must test the lamps at 132 volts and 108 volts. There is no tolerance on these test voltages. The ALT test method should be modified to include an acceptable range of test voltages. CFL life testing for example is done to a +/- 2% voltage tolerance.

**Testing Orientation, table 3 page 6 of 8**

**Methods of Measurement Reference Standards:**

A point of clarification: the horizontal orientation is a new requirement. Testing to this orientation will require new tooling and life testing capability. Is the range of operation and performance not fully covered by testing in the vertical base up and vertical base down positions? Why is the additional horizontal orientation being specifically included?