Questions:

1. What is the timeline for implementation of the new standard?
2. If a current product meets the new standard will recertification be required?
3. If a product is upgraded, can just the new LM-80 or LM-79 data be submitted or will a CB still have to retest?

Comments:

2. In revisiting the definition of an LED light engine to improve flexibility and reflect market directions, what definitions or details in addition to the Zhaga definition of LED light engine should EPA be considering? Zhaga defines an "LED light engine" or LLE as *the combination of one or more LED modules, together with an LED driver (also known as electronic control gear, or ECG).*

It is too soon to adopt a standard that is still developing. This only has the effect stifling innovation and limiting consumer choices. Other ad-hoc industry standards (ie. The Ideal connector) are proving at least as convenient, if not more, than Zhaga (for decorative luminaires).

3. If the definition of an LED light engine were to be expanded to include replaceable modules that rely on the luminaire for heat dissipation and optical control, would the inseparable SSL category still be necessary, if so, why?

The current standard is OK as is. The industry is just now catching up to E-star and needs a period to realize the benefit of investments made to meet this standard.

4. For luminaires shipped with ENERGY STAR certified LED lamps, would LM-82 testing be necessary if a light output ratio test were performed during lamp certification?

If a fixture is shipped with lamps at all, the best approach is the current one to list the lamp on the CSD. E-star is over-reaching by trying to control too many variables. Consumers already are choosing to install more efficient sources even with the appearance and light quality seem to be poorer than traditional sources. There is a "new normal" at play and the immaturity of the market would not benefit from additional requirements at this time.

5. EPA has identified a few ENERGY STAR luminaires categories that may also benefit from an ENERGY STAR retrofit option, such as wall sconces and ceiling mounts. This would reduce material costs and luminaire light losses, and potentially allow for better optimization of light. Are there additional retrofit or new residential directional categories that EPA should be considering?

No

6. Are there additional areas of residential lighting with significant energy saving potential that EPA should be considering for inclusion in the specification? New product suggestion proposals should include energy savings potential, market information and technical performance considerations.

No

During the past 5 years there have been dramatic improvements in the available shapes, efficacy, performance and cost of ENERGY STAR certified bulbs. The current consumer need is pairing the appropriate high quality efficient light source with the fixture. As a result, EPA is examining a certification path that would allow luminaires to ship with ENERGY STAR certified screw based lamps. Allowing this pathway could significantly streamline product certification. This change could also improve the availability of high quality, efficient decorative luminaires for consumers, and ease replacement with an efficient bulb, as needed.

This is a terrible idea. Consumers already have this choice and do not need luminaire manufacturers to include lamps that are manufactured by a 3rd party. This increases the cost to end consumers, reduces selection and creates burdensome compliance/testing requirements for luminaire manufacturers.

Louie Morales | Progress Lighting | **Commercial Product Manager**
701 Millennium Blvd. Greenville, SC 29607 | ***O:*** *864.678.1201* | ***M:*** *864.680.7806*
F: *864.678-1411* | ***e-mail:*** *lumorales@progresslighting.com*