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THE LIGHT CENTER OF THE INDUSTRY SINCE 1955

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page 1 of 1

TO: Energy Star Lighting – U.S. Environmental Protection Agency

RE: ITL Comments – Energy Star Requirements for the Use of LM-80 Data

To Whom It May Concern:

Independent Testing Laboratories, Inc. (ITL) respectfully submits the following comments regarding the development of “Energy Star Requirements for the Use of LM-80 Data” as directed by the “cover memo” issued 10/21/16.

1. Item 2d, Section 3:

- a. Note Box 5 states that the subcomponent description – LED package, array, or module – requirement has now been removed, as that information is not relevant to product evaluation.

While that statement is true, it would seem that for general information purposes the requirement should remain.

2. Item 2i, Section 3:

- a. ITL supports the added reporting requirement for Color Rendering Index Ra and R9 or Spectral Power Distribution (SPD). However, it seems going forward both items should be required as both indicate important product performance qualities. Also, this information is very standard on most integrating sphere reports.

Thank you for your consideration of these comments. Please contact ITL Director of Operations Mr. Court Stout at (303) 442-1255 with any questions or comments.