

August 5, 2019

Ms. Taylor Jantz-Sell
U.S. Environmental Protection Agency

Dear Ms Jantz-Sell:

Thank you for the opportunity to comment on the potential modifications to Luminaires V2.2. Our comments are as follows:

Inseparable Other SSL Luminaires

Intertek appreciates the clarification to the inseparable SSL category to describe a category that was understood by our laboratory but was not clear for partners or other readers of this document.

Excluded Products

Ref: Line 40

We would request that the category for residential directional lighting that are not employed for general office illumination be clarified. These are often referred to as “panel” lighting but are increasingly popular in the residential sector for large rooms and kitchens. The inclusion of the word “panel” in >100 submissions on the QPL would suggest that the FAQ is either not being read or not clear.

Model Name and Numbers

Please clarify the exact definition of model name and model number that is required for submission. Many partners use additional characters for many reasons: multi-packs, tracking manufacturing suppliers, or some sort of marketing clarifications. These may or may not be included in family grouping coding or be present at the time of purchase for verification.

Submission form

We would like to request that common dual categories be included on the submission form for certification to avoid duplication of submissions. For example, “Recessed Downlight and SSL Retrofit” is a common dual category as well as “Porch Mount and Pole Mount.” Some partners request these additional fields because utilities may only offer rebates on one category that may not be visible.

I hope you find some of these comments helpful and please feel free to contact me at any time to discuss.

Yours sincerely,



Jacki Swiernik

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