



REVISION TO CFL SPECIFICATION / 3rd DRAFT/ FINAL COMMENTS

September 25, 2003

Susan Gardner
D&R International
1300 Spring Street, Suite 500
Silver Spring, MD 20910

Dear Ms. Gardner:

Thank you for the opportunity to comment on the third draft revision of Energy Star's CFL Program. Overall, the revision seems to be a good balance of the manufacturer and consumer concerns. I only have a few comments or questions:

Page 1, second bullet from bottom:

Please clarify the "third party" addition to the safety and performance statement. As such, it infers that a NVLAP accredited manufacturing facility cannot submit their own data. This third party statement is not repeated in the Laboratory Requirement columns in the performance tables.

Page 6, Correlated Color Temperature

Is there a category for lamps between 5001K and 6499K?

Page 8, Interim Life Test

What will the submission of a product failure report on two lamps accomplish? Who will be reviewing these reports? Which failure types are acceptable and which are not? What happens if there are more than one possibility or the cause is undetermined? The failure analysis of two lamps at 40% of life is not enough samples to provide an accurate analysis of what the entire set may or may not do in the future. The cost and time involved in such an examination will be very prohibitive to a manufacturing partner. I strongly suggest this provision be taken out of the new specification unless it can be clarified and adequately supported.

Since the interim point now becomes the early labeling point, I would suggest changing the language under three (or two if there is adequate support with this concern) samples failures to "not eligible for early labeling." Then the full life test will need to be completed before the listing can begin, satisfying DOE's concerns with early life failures.

The rapid cycle stress test and the interim life test have proven to be good indication tests but as such are still "prediction" tests compared to the actual average rated lifetime test. Manufacturers that are not eligible for the early labeling option because of borderline rapid cycle or interim life requirements should not have these tests held against them if they have the full, accurate, accredited, complying, third party data that covers their **entire** life test.

Sincerely,

Jacki Swiernik
Technical Team Leader - Photometrics
Intertek
ETL SEMKO Division
Cortland, NY, USA
Ph: (607) 758-6231 Fax: (607) 758-6637
email: jacki.swiernik@intertek.com
www.etlsemko.com