



March 13, 2015

via e-mail: lamps@energystar.gov

Ms. Taylor Jantz-Sell
Environmental Protection Agency
ENERGY STAR Lighting Program Manager
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Draft 1 of the ENERGY STAR™ Lamps v2.0 Specification

Dear Ms. Jantz-Sell:

Lucidity Lights, Inc. greatly appreciates the inclusion of induction technology in the v2.0 draft.

As a NEMA member, Lucidity echoes and supports the comments submitted by NEMA. We also offer additional comments on the next page.

Please contact me if you have any questions.

Sincerely,

Anthony Serres
Lucidity Lights, Inc.

cc: John Goscha – Lucidity

Comments on Energy Star Lamps Specification v2.0 – Draft 1
Lucidity Lights, Inc.
March 13, 2015

General

Throughout the document, references to LM-65-11 and LM-66-10 should be replaced with the soon to be published revisions.

Section 4.0 – Definitions

We offer an alternate definition for an induction lamp which we feel is more concise:

Induction Lamp: A fluorescent lamp in which energy is coupled into the discharge vessel by means of an induced electromagnetic field. It is a form of an electrodeless fluorescent lamp. For purposes of this specification, induction lamps include integral electronic ballasts and are equipped with an ANSI standard base.

If Energy Star wishes to use the existing definition, we offer a minor grammatical change:

Induction Driven Electrodeless Fluorescent Lamp: A ~~self-ballasted~~ fluorescent lamp that uses electromagnetic induction to generate a discharge current, forming a closed loop inside the tube structure which excites internal gases and converts this into visible light through phosphor. For purposes of this specification, these lamps include integral electronic ballasts and are equipped with an ANSI standard base, and are also referred to as “induction lamps”.

Section 5.0 – Test Criteria

Add induction lamps to the last sentence of the section.

Proposed Text

IES LM-65 and IES LM-66 are applicable to both hot and cold cathode lamps, [and induction lamps](#).

END COMMENTS