

MaxLite Comments on ENERGY STAR® LAMPS Specification Version 2.0			
Re:	11/6/15 Proposed Revision to Select Elements of Draft V2.0 ENERGY STAR Lamps Specification	<i>comment date</i>	11/23/2015
Section	ML Comments	Suggestions	
Rated Life	MaxLite supports reducing LED Omnidirectional lifetime requirements to 15,000 hrs	Reduce lifetime as proposed	
Omnidirectionality	MaxLite supports changes in omnidirectionality requirements for LED lamps as proposed. Note however that per our comments to Draft 3.0, we still support ALL ANSI shapes of LED filament lamps being categorized as "decorative" beams.	Revise omnidirectionality requirements for LED lamps as proposed. Include exceptions for LED filament lamps.	
Power Factor	MaxLite supports reduction in PF for LED lamps to 0.5PF.	Require all LED lamps to meet 0.5 PF as proposed.	
Efficacy	There will be a significant impact to our business if this proposal for increased efficacy for most lamp types is implemented as this will mean limited sales for certified CFL lamps after January 2017. However, as long as EPA allows an adequate transition period for certified CFLs to ramp down production and sell through the market, we can support this efficacy increase.	Increase efficacy levels as proposed. Work with stakeholders to develop an adequate production ramp down and sell-through time frame and process.	

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Re:	Draft 3	<i>comment date</i>	9/4/2015
Section	Desc	ML Comments	Suggestions
1.1	Included Products	We welcome the G4/G9 additions. In addition to G4 and G9, we suggest adding other halogen bases such as: Wedge Base, GY6.35, BA15s. Many of these lamp types are becoming popular LED options for replacing relatively high wattage halogen lamps.	Expand scope to include at least Wedge Base, GY6.35, BA15s bases
9.1	Luminous Efficacy	We support the change to a single efficacy. Since Omnidirectional, Directional, and Decorative all now are same. Suggest combining the rows in the column showing these to make the table more clear.	Revise table to combine all lamp types as 65lpw
9.5	Luminous Intensity Distribution	In Draft 3, ST lamps were added to scope of ANSI decorative lamp envelopes. However, it is (probably inadvertently) missing from the "Decorative" table in this section. Suggest that you omit repeating the same list shown in Section 1.1 here and just make a statement referring it back to 1.1	Omit repeating same list of ANSI standard shapes, and refer reader back to Section 1.1 (or add ST shape).
9.5	Luminous Intensity Distribution	After reviewing beam tests for all of our LED filament lamps, we found it will be nearly impossible for current most popular LED filament lamps of any ANSI shape (due to the way the LED filaments are constructed) to comply with Omnidirectional luminous intensity requirements of this section. We feel the same is true for most all filament lamps on the market. As such we suggest <u>ALL</u> LED filament lamps regardless of ANSI shape be required only to meet the "Decorative" luminous intensity distribution requirements.	Under Lamp Type in this section, include a note that ALL LED Filament lamps only need to meet the decorative luminous intensity requirements, regardless of ANSI shape.
14.1	Dimensional Requirements	While we are happy that EPA added the G4 and G9 ANSI shapes, many current technology LED G4 and G9 lamps will not meet the ANSI lamp envelope dimensional standards. Due to the attempt to closely match light output of tiny 25W to 50W halogen lamps they are intended to replace, most LED lamps with G9 and G4 bases are larger than the ANSI max/min. Larger housings/heat sinks required due to thermal challenges of these tiny spaces. If these lamps are required to match same form factor as Halogen, there will be limited product availability and low light output LED lamps eligible for Certification.	Consider exclusions for LED lamps that would allow some leeway in meting ANSI standard envelopes.