



KYLE PITSOR

Vice President, Government Relations

December 18, 2015

VIA EMAIL TO: lamps@energystar.gov

Ms. Taylor Jantz-Sell
Environmental Protection Agency
ENERGY STAR Lighting Program Manager
1200 Penn. Ave NW 6202J
Washington, DC 20460

NEMA Comments on Draft ENERGY STAR® Program Lamp Specification v2.0 Final Draft

Dear Ms. Jantz-Sell,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide the attached comments on the subject proposal. These comments are submitted on behalf of NEMA Light Source Section companies.

As you may know, NEMA is the trade association of choice for the electrical manufacturing industry. Founded in 1926 and headquartered near Washington, D.C., NEMA represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the U.S. Domestic production exceeds \$117 billion per year.

First, we wish to revisit in writing our previously emailed concerns over the potentially negative precedent being set in the Final Draft of version 2.0 of the Lamps Specification by including a requirement to report IES TM-30 test data. As you know, NEMA has issued a position paper¹ against making TM-30 a public requirement until such time as the standard has seen more use, familiarity, and possibly revision. We also note that the Illuminating Engineering Society² (IES) and the International Commission on Illumination³ (CIE) have issued similar position statements about TM-30. Our statements urge caution against embracing TM-30 too soon. While we respect that ENERGY STAR is only intending to gather information for study, we ask you to remember your influence on other programs and entities and the precedent it sets. ENERGY STAR seems to recognize the fact that TM-30 is not yet ready for widespread use by making TM-30 a reporting requirement only, but we believe EPA needs to consider the potential for others to perceive the reporting requirements as an endorsement of TM-30. EPA should not contribute to this perception. NEMA asks ENERGY STAR to remove TM-30 from the specification and bring it into a less public, less formal setting so that it is only employed for study and investigation, rather than part of a formal requirements document.

¹ <http://www.nema.org/Standards/Pages/Light-Source-Color-Rendition.aspx>

² <http://ies.org/PDF/PositionStatements/PS-8-15.pdf>

³ http://www.cie.co.at/index.php?i_ca_id=981

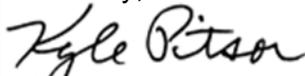
Secondly, NEMA reiterates our comments from February 2015⁴ in which we urged the EPA to not remove the allowance for one failure during testing for rated life. We understand that at first this was done to align with DOE draft test procedures, but we note that DOE has changed their proposed test procedure since to a less onerous method that accommodates the inevitability of some infant mortality due to manufacturing variation, in view of the “bathtub curve” of normal product lifetime performance. We ask ENERGY STAR to return to the original allowance for one failure as per the current Lamps v1.1 specification until the DOE LED Lamps Test Procedure⁵ is finalized and ENERGY STAR can update the Lamps Specification as needed to refer to it.

From our previous NEMA comments:

- a) Clause 10.2, Rated Life: The removal of the one-failure allowance will significantly impact product qualifications and design.
- b) Clause 10.2, Rated Life: One might interpret the proposed language to mean that LED products must all be operational at the end of rated life. We suggest keeping the requirement in Lamps v1.1 that all tested units be operational at 3,000 hours and $\geq 90\%$ of the lamps be operational at the end of 6,000 hours.

Thank you for your consideration of these comments. We look forward to working with you further on this important project. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,



Kyle Pitsor
Vice President, Government Relations

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http://www.nema.org/Policy/Documents/NEMA%20Comments%20ES%20Lamps%20V2_0%20Draft%201%2013Mar15%20v6.pdf

⁵ https://www1.eere.energy.gov/buildings/appliance_standards/rulemaking.aspx/ruleid/18