



via e-mail: [lighting@energystar.gov](mailto:lighting@energystar.gov)

November 23, 2015

Ms. Taylor Jantz-Sell  
ENERGY STAR Program  
US Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

### **ENERGY STAR Lamps 2.0 Interim Proposal Comments**

Dear Taylor:

Philips Lighting appreciates the opportunity to provide the attached comments on the Interim Proposal of the Lamps v2.0 Specification.

Philips North America is headquartered in Andover, Massachusetts. The U.S. Philips companies are affiliates of the Netherlands-based Royal Philips N.V., a diversified health and well-being company, focused on improving people's lives through meaningful innovations. Our long history in North America began in 1933, and today, it is the company's largest single market in the world, with approximately 22,000 employees and operations at 55 major facilities in 25 states and across 3 Canadian provinces. Sales for the region in 2013 was more than \$9.5 billion\*, which accounts for more than 30% of Philips global revenue.

Philips is a diversified technology company, focused on improving people's lives through meaningful innovation in the areas of Healthcare, Consumer Lifestyle and Lighting. Innovation has been a cornerstone of the company's strategy for over 120 years, creating a strong and trusted Philips brand with market access all over the world. Philips is a leader in cardiac care, acute care and home healthcare, energy efficient lighting solutions and new lighting applications, as well as male shaving/grooming and oral healthcare.

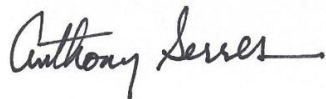


# PHILIPS

Philips lights 65% of the world's top airports, 30% of offices and hospitals and landmarks such as the Empire State Building, the Sydney Opera House, the New Year's Eve Times Square Ball and the Great Pyramids. Philips owns more than 64,000 patent rights, is one of the world's top-50 most valuable brands, one of the world's top-50 most innovative companies, and ranked as one of the Best Global Green Brands by Interbrand.

Please find our detailed comments below. We look forward to working with you further on this effort. If you have any questions on these comments, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Anthony Serres". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthony W. Serres, LC  
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## Comments on ENERGY STAR Lamps v2.0 Interim Proposal

November 23, 2014

On November 6, 2015, ENERGY STAR issued an Interim Proposal for stakeholder review and comment. The proposal touches the areas of rated life, omnidirectionality, power factor, and efficacy.

Our comments will address these issues and the additional topic of color rendition.

### **General Comments**

The proposed changes appear to be targeted at "... an opportunity for the ENERGY STAR label to be associated with a broader range of high-quality products at lower price points ...". As a strong supporter of the Energy Star program, we wish to caution that changing the specification as proposed is likely to have unintended consequences and may fail to accomplish what Energy Star intends, i.e., fewer models may be brought into the program. Energy Star market share will rise on its own, without changing the specification, as CFL and incandescent lamps disappear from the market.

Thus, as communicated previously, Philips Lighting does not support the general relaxation of the criteria from those proposed in Draft 3. Exceptions are presented below.

### **Rated Life**

Although we are not in favor of a reduction in the rated life, we recommend to drop the requirement to 10K hours. This compares favorably with CFL lifetimes and 10K hour SSL product have been well received by consumers. The passing requirement, i.e., 9 of the 10 lamps must meet the life requirements should remain unchanged.

With a drop in lifetime, the testing requirement, current at 6000 hours, should be reduced. We propose the first qualification Milestone at 2000 hours, with the second milestone at 4000 hours.

### **Omnidirectionality**

In the webinar on 11/23 to discuss the proposed changes, Energy Star mentioned that they have conducted research regarding the new omnidirectional criteria, but cannot share it yet. This makes it extremely difficult to refute; we suggest that any changes in this area be postponed until manufacturers have a chance to review and properly comment. For now, our comments that the existing omnidirectional requirements should not be changed stands.

### **Efficacy**

We appreciate that Energy Star acknowledges that high CRI products ( $\geq 90$ ) are inherently less efficient than lower CRI lamps. We think that the assumed 10% efficacy improvement by 2017 will be much less. Thus we suggest that the proposed efficacy values change as follows:

	Minimum Lamp Efficacy	
	CRI $\geq 90$	CRI $< 90$
Omnidirectional	65	75
Directional	60	70
Decorative $> 3W$	65 (No change)	
Decorative $\leq 3W$	55	

In our Draft 3 comments, we proposed an efficacy break at 3W for decorative product because low wattage dimmable lamps are inherently less efficient than non-dimmable lamps. We repeat that request in the table above and refer you to our Draft 3 comments for the technical details.

### **Color Rendition**

There has been discussion in one of the webinars that ENERGY STAR would require reporting of color parameters associated with IES TM-30. We appreciate that Energy Star is staying current with changes in the industry, however, we strongly encourage Energy Star to wait until this issue shakes out before even incorporating a reporting requirement into either the Lamps or Luminaires specification. As noted in the attached position paper, the CIE is studying this, and cautions against a regional standard. NEMA recently issued a position paper (also attached) that cautions against any mandatory reporting or performance requirements associated with TM-30.

END COMMENTS