



via e-mail: lighting@energystar.gov

December 9, 2016

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

RE: Comments - ENERGY STAR™ Requirements for the Use of LM-80 Data

Dear Ms. Jantz-Sell:

Philips Lighting appreciates the opportunity to provide the attached comments on the draft ENERGY STAR™ Requirements for the Use of LM-80 Data.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Anthony Serres".

Anthony W. Serres, LC

Manager, Technical Policy
Philips Lighting

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Comments on ENERGY STAR Requirements for the Use of LM-80 Data

December 9, 2016

Philips Lighting offers the following comments on the draft ENERGY STAR Requirements for the Use of LM-80 Data published on October 21, 2016.

Section 1 – Timeline for Implementation

The first sentence of the second paragraph reads:

90 days after final publication of this document, these requirements for reporting of LM-80 test data apply to all issued or revised reports.

As written, it could be interpreted to mean that 90 days after final publication, the requirements apply to all issued or revised reports, regardless of when they were issued. We suggest the following revision to make it clear that only reports issued 90 days after publication must follow the document:

These requirements for reporting of LM-80 test data apply to all reports issued or revised 90 days or more after final publication of this document,

Section 2 – Definitions

COB LED Packages

We suggest that the following text from the LED package definition be added to the COB LED package definition:

Power source and ANSI standardized base are not incorporated into the device. The device cannot be connected directly to the branch circuit.

Successor

In the definition of Successor there is a list of features. The intent appears to be that a ‘successor’ must meet all of the listed features. Is this the correct? We draw your attention to this because in Section 3 items 2 and 7 have similar lists where the word **each** is used to clarify that all items must be satisfied. The omission of the word ‘each’ from the successor definition could be interpreted as meaning that *any* of the features could be met. We urge EPA to amend the text to clarify this potential misinterpretation.

Section 3 – Content of LM-80 Test Reports

Please clarify or provide an example on how to calculate the ‘average calculated current per die’ in item 7(b). Also, range and standard deviation of the values should be reported.

Section 4 – Application of LM-80 Test Reports

Items 4 and 6(b) – Same comment from Section 3 regarding average current.

END COMMENTS