

## Rogers, Daniel

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**From:** Hayley Gau <hgau@tcpi.com>  
**Sent:** Friday, December 18, 2015 8:18 AM  
**To:** lighting@energystar.gov  
**Subject:** ENERGY STAR Lamps V2.0 Final Draft comments

Hello,

TCP has several counter points we would like to share regarding the specification change in Power Factor for Omnidirectional lamps with 10 watts or less. They are listed below:

1. Our cost out from a PF of .7 to .6 to .5 has seen a 20% savings in cost
2. No one during the 4 conference calls with the EPA had any strong objections to reducing the Power Factor requirement to 0.5
3. The current CFL requirement of 0.5 should be sufficient for LEDs
4. All TCP and competitor samples tested have produced a PF rating of 0.5
5. TCP lamps are being designed with a PF of 0.5 to meet the market demands of lower costing LEDs while maintaining a specification that the consumer can rely on.

We disagree with the removal of the 3% tolerance for lumens, as this will further reduce the number of lamps eligible for Energy Star certification. It is fully understood that the EPA's intention is to limit ENERGY STAR certification for products of superior quality however, setting a higher threshold will contribute to a larger gap in the marketplace between products that perform well and products that are affordable.

Additionally, there are variances between testing labs and the 3% tolerance allowed for those variances. Removing this variance allowance could prove detrimental to the third party audit process.

Best Regards,

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