
From: Lockner, Jeffrey
Sent: Friday, March 13, 2015 3:18 PM
To: lighting@energystar.gov
Subject: ENERGY STAR Lamps 2.0 Draft 1 Comments

Hello Lighting Team,

Thank you for the opportunity to provide comments and feedback on the ENERGY STAR® Lamps V2.0 Draft 1 specification. Please find our comments below.

1. Section 9.3 Elevated Temperature Light Output Ratio:
 - a. UL suggests that under the exemption language that “not for use in enclosed” should be removed and only having not for use in recessed fixtures be exempt. Most directional lamps are labeled not for use in enclosed fixtures and the verbiage as it stands could lead to confusion on whether a directional lamp needs to be tested or not.
 - b. LM-82-12 as a test method. - What would be your temperature monitoring point (Tb)? During LM-82 testing a thermocouple is attached to the DUT and used for controlling the temperature set points. During ETLOR testing the temperature is monitored in air above the base of the lamp.
2. Section 10.1 Lumen Maintenance
 - a. For Solid State lamps under the supplemental guidance section. UL suggests that the verbiage under what lamps are to be tested in the Ambient Temperature Life Test, be changed to Directional lamps labeled not for use in recessed fixtures. We believe the intent of this verbiage is to only allow directional lamps that are not meant to be used in recessed fixtures to be tested at ambient temperature since most directional lamps are labeled not for use in enclosed fixtures because of their design and distribution pattern.
3. Section 12.6 through 12.12
 - a. Are Test Labs or Certification Bodies going to have to test for these features or will the manufacturers be required to provide documentation stating they meet these criteria?

Thanks,
Jeff

Jeff Lockner
Project Engineer

Lighting Center of Excellence
Underwriters Laboratories Inc.
7036 Snowdrift Road, Suite 200
Allentown, PA 18106

jeffrey.lockner@ul.com
Phone # - 610-774-1309
Cell # - 484-714-5108
Internal Ext - 21309

This e-mail may contain privileged or confidential information. If you are not the intended recipient: (1) you may not disclose, use, distribute, copy or rely upon this message or attachment(s); and (2) please notify the sender by reply e-mail, and then delete this message and its attachment(s). Underwriters Laboratories Inc. and its affiliates disclaim all liability for any errors, omissions, corruption or virus in this message or any attachments.