

UL Verification Services, Inc. Feedback on Proposed ENERGY STAR® Program Sunsetting

To whom it may concern:

Thank you for the opportunity to comment on the proposal to sunset the ENERGY STAR lighting programs including lamps, luminaires, and ceiling fan light kits. UL Verification Services, Inc. has been an ENERGY STAR approved testing laboratory and certification body for more than a decade and strongly supports the ENERGY STAR lighting programs continued existence.

The ENERGY STAR mark has evolved into one of the most recognized and trusted marks in the US by consumers, retailers, manufacturers, designers, and lighting showrooms. Over time, market perception has evolved from one based primarily on energy efficiency to also providing high confidence in the quality and reliability of lighting products. This is supported by the structure of the program which requires key program components such as initial product qualification testing, third-party certification and ongoing product performance verification. The continued annual surveillance testing has proven to be both necessary and important, as even today, we continue to experience significant product failures in the lamp and luminaire categories.

Today, many retailers rely on the ENERGY STAR program in their product acceptance protocols to minimize product returns and meet consumer expectations for product performance and reliability. The ENERGY STAR program, has in essence, become a vital part of quality assurance for the lighting products found on many retailer shelves. ENERGY STAR has provided a consistent, valued approach towards product quality, and without it we are likely to see a fragmented approach to quality as manufacturers, retailers, and utilities, seek to identify a replacement program or develop individualized approaches with third-party labs and certification bodies. The lack of a consistent approach including the ENERGY STAR mark on lighting products will likely create confusion in the marketplace, and potentially lead to a lack of consumer confidence.

With the advancement of LEDs, meeting efficiency metrics alone is not the barrier it once was with legacy lighting technologies. Lifetime, color metrics, standby power, start time, and flicker have been the main barriers to entry into the ENERGY STAR program. Pointing to the progression of LED efficiency alone as cause for sunsetting the program would be a disservice to what the ENERGY STAR program has been able to accomplish more broadly.

We understand the implications of the DOE published final rules regarding General Service Lamps, however we do not see a similar avenue for Luminaires or Ceiling fan light kits. Taking into consideration the lack of a robust test lab qualification process and independent certification of LED lamps for the DOE program, we support the continued collective existence of the ENERGY STAR lighting programs as a whole.

Thank you for your consideration, and please feel free to contact me for additional information.

Best Regards,



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