

Conglom, Inc.

Partner and Stakeholder Criteria – 2nd Draft Comments

Start Date of 11/01/03

- We support the start date of November 1, 2003.

Full Qualification Submission

- We believe that lamps should be qualified only upon receipt of the 40% of life lumen depreciation report by a NVLAP lab.
- We are concerned that some companies have many products listed that do not qualify for the Energy Star label. They submit initial data (1000 hours), earn the Energy Star label, and begin selling the labeled product. They discontinue selling the item well before the 40% lumen maintenance results are out. Then they voluntarily remove the product from the approved product list.

Sample Size / Test Positions

- We support the sample size of 10, as that is what is currently being done by NVLAP labs.
- The average of 10 bulbs should be based on testing 5 bulbs base up and 5 bulbs base down, as we do not know how the lamp will be used in the market.
- At present, they only report the figures that relate to the optimum burn position, disregarding the other burn position. Using both burn positions will lower the averages.

Efficacy

- We support increasing the efficacy to match the Chinese program.

Listing Procedures

- A model with multiple pack sizes should be listed as one item to make the list simpler.
- We support cross referencing of private label products.

De-Listing Procedures

- We believe there should be a 2-tier delisting procedure; one that would mark the product as voluntarily de-listed, and one that would mark the product as failed Energy Star criteria.

Product Failure During Testing

- If a bulb is tested by PEARL and it deviates less than 5% from its NVLAP report, then the manufacturer should be allowed to voluntarily de-list the product. If the deviation is more than 5% from its NVLAP report, then Energy Star should strike the product from the list and mark it as a failed.
- We support random testing.

CCT / CRI

- We support the use of numbers and/or words to indicate color. If we continue to use words such as “soft”, “warm”, or “cool”, we must have a specification in place to clarify the meaning of the wording. We must educate consumers as to the meaning of these words.
- We prefer the box that was proposed by the LRC showing the upper and lower spectrum of each colour temperature.

Conglom, Inc.

Partner and Stakeholder Criteria – 2nd Draft Comments

- We support printing the exact temperature on the packaging, but not limiting it to the 5 proposed temperatures.
- We would also like clarification on the exactness of the average color temperature. Traditionally, we have rounded numbers to the nearest 50.

Sales Data Submission

- We suggest that products that have no reported sales in the last 18 months be removed from the list.
- We suggest that there should be some form of corporate security on sales reporting. The reporting should be vague enough to protect the clients and manufacturers but detailed enough to give DOE the information it needs.

Warranty

- We agree to the 2 year warranty as long as it can be a “Limited Warranty”.

Reflector Testing

- We support changing the testing protocol so that the consumer is protected. The new test should be more in line with the actual usage, base up in a recessed can.

Packaging Requirements

- We suggest allowing the use of wording that would identify all products that meet the latest Energy Star criteria (November 1, 2003).

Equivalency Statement

- We believe that the packaging must include an equivalency statement as most consumers can identify with an incandescent wattage much more readily than a lumen value. Consumers are just beginning to comprehend the meaning of lumens.