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As an Energy Star partner, Feit Electric would like to submit the following comments regarding the 2nd Draft (4/15/03) revision of the Energy Star Specification.

Correlated Color Temperature (CCT)

The proposed revision of the specification does not allow for lamps to fall between or outside a temperature range. Based upon our experience lamps very rarely average or measure EXACTLY 2700K, 2850K, 3000K, 4100K or 6500K. As a matter of fact, I think this will be impossible for any manufacturer..

In addition there are lamps that are made specifically at 2650K or 2750K or 3100K etc.. Based upon this proposed new specification a "warmer" lamp of 2650K would not be able to meet the specifications. Lamps should be allowed to fall outside the specific color temperatures as long as the packaging clearly states the temperature(in Kelvin) and the corresponding color.

Warranty

Feit Electric does not favor a mandatory 24 month warranty. The current and proposed specifications call for a minimum life of 6,000 hours. There are 8,760 hours in a year. Therefore, if a lamp is used continuously it should last 6,000 hours or 8 months. DOE states that the Energy Star specifications are intended for residential applications. However there are no "residential" life hour specifications. The warranty should be based upon hours of use and not time.

Bi-Annual Unit Shipment Data

Feit Electric does not currently release this type of data and many of our customers would not allow us to include their data. We therefore oppose this proposed requirement.

The above comments and additional comments should be discussed at the upcoming April 29th meeting in Washington.