

## **American Fluorescent Corporation Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 1 Eligibility Criteria – Version 4.0**

We have reviewed your recently received Draft 1 for Energy Star qualified fixtures eligibility criteria V4.0. As a lighting manufacturer that has received one of the highest number of Energy Star approved listings, we applaud your efforts to tighten up the specifications and to emphasize the importance of fixture quality in your standards. We feel that these standards will help set Energy Star fixtures apart in the industry and give the mark the perceived importance it requires.

We have two issues however that we would like you to address in your draft.

1. Your requirement that all fixtures must have a replaceable ballast is fine for most fixtures except for the lighting category of portable corded shoplights. This is a very large market in the millions of units a year in this country. Currently we have received an Energy Star approval for several of our shoplights. However due to the tight margins for the entire industry in this product category (some full sized 4' fixtures sell for less than \$10 retail) the construction of these shoplights are required to be as minimal as possible.

Therefore our fabrication methods do not allow any room for the inclusion of a replaceable ballast. The circuit board is built into the endcaps and components like sockets on/off switches and cordsets are built right into the circuit board. This is an industry standard construction method that allows manufacturers to compete at the low price points required for this product. Consumers have certain price expectations of this product category. Our ballast in this fixture is safe, high quality and efficacious, it passes your current and proposed testing, but due to the fact that it is not replaceable, the fixture will lose its deserved energy star approval under your proposed guidelines.

We ask for an exemption to the replaceable ballast provision for portable corded shoplight type of lighting fixtures. This is a very large category that would be better served by being regulated under the higher quality and efficacy standards of the new energy star regulations.

2. Expiration of Energy Star qualifications provision. We agree with the intent of this new specification. We agree that all fixtures that have received an Energy Star rating under the previous version of the specifications need to be resubmitted within three years of the date of original submission if there exists a new and substantially modified version of the Energy Star specifications. However we do not agree with the requirement that every individual fixture needs to be tested again, through the entire battery of testing every three years, especially if there are no major modifications to the Energy Star specifications.

We believe that there should be an Energy Star renewal procedure that requires each manufacturer to resubmit each sku every three years to verify that they wish to keep their Energy Star rating and to certify that there have been no modifications to the fixture in design, componentry or fabrication that would alter the original testing results. We feel that unnecessary retesting of each and every fixture would be an undue burden, especially on the manufacturers, who have already made a big investment in developing and promoting larger numbers of Energy Star products.

American Fluorescent appreciates the work that has been done in this draft to improve Energy Star testing. We hope that the above comments can be considered for inclusion into the final draft of these important Energy Star specifications.

Thank you for your consideration and we look forward to your response.

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