



June 14, 2010

To: luminaires@energystar.gov

The Aurora International Testing Laboratory, AITL, is pleased to have the opportunity to comment on the EPA's first draft of the ENERGY STAR Luminaires specification intended to replace the Residential Light Fixtures (RLF, V4.2) and Solid State Lighting (SSL, V1.1) specifications.

Our comments are in italics

AITL feels the definition of Run-Up time should be consistent with ANSI C82.13: 2002 For Lamp Ballasts - Definitions for Fluorescent Lamps and Ballasts. "run-up time: The time needed after switching on the supply for the lamp to reach 80% of its stabilized luminous flux."

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The ENERGY STAR requirements of The time needed after switching on the lamp to reach full rated lumen output... Should be changed to The time needed after switching on the supply for the lamp to reach 80% of its stabilized luminous flux.

Consistency in the wording of the definitions is critical. Also full rated lumen output may not be achievable on 100% of the test samples due to tolerances and variation. However, stabilized output can always be reached.

Again, thank you for the opportunity to comment.

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