

Email received on May 11, 2010 from Christopher Payne.

Thank you for your efforts to develop an ENERGY STAR specification for Luminaires. As you know, federal buyers are required by EPA Act '05 and EO 13423 to buy ENERGY STAR-qualified and FEMP-designated products. In this case, a federal buyer seeking a residential lighting fixture would be required to purchase an ENERGY STAR-qualified luminaire.

I foresee a potential problem with communication to the federal market regarding an ENERGY STAR specification for luminaires. FEMP has established a number of FEMP-designated purchasing requirements for commercial lighting products, including a number of luminaire types (downlight, industrial, fluorescent.) I fear that federal buyers are going to be very confused about the applicability of ENERGY STAR vs. FEMP criteria with regard to lighting products. Should they be buying an ENERGY STAR-qualified luminaire or a FEMP-designated fluorescent luminaire?

I believe that the specifications of the programs themselves differentiate between residential and commercial products; however, that distinction may not be clear in the names given the product categories. I recommend that ENERGY STAR explicitly name its specification for "Residential Luminaires" rather than simply "Luminaires." Doing so should have no significant impact on the specification development process, but it would help reduce confusion in the federal market.

Please feel free to contact me with any questions regarding this issue.

Sincerely,

Christopher Payne

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