

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

May 16, 2006

Dear Residential Light Fixture Manufacturer or Other Interested Party:

On April 6, 2006, the US Environmental Protection Agency (EPA) notified you of our intent to propose amendments to the ENERGY STAR Eligibility Criteria for Residential Light Fixtures (RLF) in two key areas. In light of the Department of Energy's pending revision to the ENERGY STAR specification for screw-based CFLs, EPA has been encouraged to provide additional information in terms of the performance requirements anticipated for ENERGY STAR qualified GU-24 integral lamps as part of an amended RLF specification. The enclosed draft specification language represents a preliminary draft amendment addressing the GU-24 integral lamp. We are not requesting comments at this time. An official draft, also incorporating amendment language to address certain LED fixture applications, continues to be planned for release in August, 2006, at which point the Agency will request comment.

For the GU-24 integral lamp, EPA plans to take the approach of adopting strict performance requirements from both the CFL and RLF specifications. One of the performance requirements we believe is important is the 10,000 hour life measure. Consumers buying today's ENERGY STAR qualified fixtures are taking home products with higher-quality components and reduced product failures because of this requirement. We believe that a strict performance approach will yield ENERGY STAR qualifying GU-24 replacement lamps that will meet the needs of today's consumers. EPA also believes that testing in heated test conditions to simulate enclosed fixtures is very important because many GU-24 integrated lamps will likely be used in such fixtures. Requiring lamps to perform under these conditions will reduce the risk of performance problems and the resulting consumer dissatisfaction. EPA also continues to plan that only lamps that meet fixture specification performance levels will be allowed to be shipped with ENERGY STAR qualifying fixtures.

As part of developing this specification amendment, EPA will continue our ongoing lab testing of GU-24 integrated lamps and develop new test procedures to simulate heated and other stressed fixture environments, as appropriate. In order to integrate our performance requirements with state efforts, our draft requirements meet California's Title 24 residential new construction requirements.

We look forward to working with you to develop program requirements that balance the needs of consumers with the abilities of our manufacturing partners. Please feel free to contact me with any questions at shiller.david@epa.gov or 202-343-9397. Thank you for your continued support of ENERGY STAR.

Sincerely,

A handwritten signature in black ink, appearing to read "David Shiller".

David Shiller, Product Manager
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