



October 29, 2010

American Lighting Association Comments  
on the  
ENERGY STAR Program Requirements for Luminaires  
Version 1.0, Draft 2

We appreciate this opportunity to again comment on the proposed requirements for this first version of the Luminaires part of the Energy Star Lighting Program.

As before, these comments are intentionally somewhat general since individual ALA members are submitting detailed comments on specific items of particular concern regarding their products.

The ALA has the following comments regarding Version 1.0, Draft 2:

We remain concerned about the testing requirements and especially the proposed increase in the annual verification testing from 1% to 10% of the models. The added cost and complexity all done at the manufacturer's expense, is certain to limit participation in the ENERGY STAR program. Residential luminaires, particularly the non-directional designs, are uncomplicated straightforward electrical devices which vary little from sample-to-sample. That should be taken into account in order to maintain a variety of products in the market which benefits both consumers and the ENERGY STAR Program. The ALA recommends maintaining the present 1% sample rate.

Page 13. Under-Cabinet Luminaires. Lumen density requirements have little to do with the successful application of these products because of varying space dimensions, material reflectance characteristics and designer preferences. Some designers prefer, for example, to mount such luminaires reversed so as to obtain improved glare shielding and an enhanced distribution of light on the rear wall which may be made of decorative materials. We urge that the lumen density requirements be eliminated for these products.

Page 20. Correlated Color Temperature (CCT) Requirements: All Indoor Luminaires. The ALA agrees with ENERGY STAR that, for residential lighting, allowing CCTs above 4100 Kelvin should not be permitted. Feedback from our manufacturers and retailers continues to indicate that, with rare exceptions and only for certain applications such as workshops for laundry rooms, CCTs of 2700-3000 Kelvins are overwhelmingly preferred.

Page 21. Color Rendering Requirements: All Indoor Luminaires. In lieu of a better color rendering metric, has ENERGY STAR considered raising the minimum CRI requirement for light sources intended for interior residential lighting? The  $R_a \geq 80$  value is a modest requirement. Sources of  $R_a = 80+$  are now widely used even in commercial and industrial lighting. Considering

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that residential lighting is still dominated by incandescent light sources with a CRI of 98-100 and consumer complaints regarding more efficacious sources continue to mention “poor color” as a main reason that such sources are unacceptable, the minimum CRI should be increased. ENERGY STAR might schedule higher minimum CRI requirements in steps as they have done for the efficacy improvement of light sources. Ensure Quality of light and proper application of lighting.

Page 41. Lighting Toxics Reduction Requirements. The ALA believes that the Draft 2 revision to include the European Union RoHS (Restriction of Hazardous Substances) Directive requirements is premature. While there may be some value in adopting certain specific provisions of the Directive, the general requirement as written in the first paragraph on Page 41 which says:

“Luminaires and lamps shall not exceed hazardous substance concentrations set forth in the European Union’s (EU) Restriction of the Use of Certain Hazardous Substances (RoHS) Directive, 2003.”

Is not acceptable. Not only does it burden manufacturers with the massive task of analyzing all of the materials in the lamps and luminaires that they propose to qualify for Energy Star in a few months time, there has been no industry discussion about whether or not the values and requirements proposed are reasonable, achievable or in accord with those already required in the U.S. – for example in California Prop. 65.

Note: The link from the sentence on Page 41, “A complete list of RoHS exemptions that may apply can be found [here](#).” returns an error.

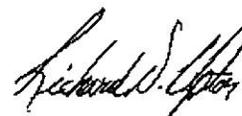
The ALA remains ready to assist ENERGY STAR in this important industry effort. Please contact Terry McGowan, FIES, LC at [lighting@ieee.org](mailto:lighting@ieee.org) or 216-291-1884 with any questions regarding these comments.

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