

Ms. Taylor Jantz-Sell
Lighting Program Manager, ENERGY STAR
ENERGY STAR Program
Office of Air and Radiation
U.S. Environmental Protection Agency

RE: Comments on ENERGY STAR Lamps Draft 4 Version 1.0

Dear Ms. Jantz-Sell,

The International Association of Lighting Designers [IALD] appreciates the opportunity to comment further on ENERGY STAR Lamps Draft 4 Version 1.0. As the leading global organization of independent architectural lighting designers, the IALD is interested in developing responsible guidelines for energy conservation while also accounting for quality of light in the built environment.

The focus of our comments is again on the need to address the effect of the proposed standards on lighting quality. It appears that in Draft 4, EPA continues to adopt a methodology that reduces lighting quality in favor of raising efficacy to keep price low. However, past experience, such as that with CFL lamps, indicates that American consumers are unwilling to accept reduced lighting quality even when coupled with significant energy savings.

Overlooking lighting quality will lead to decreased consumer acceptability of energy efficient lamps and lost opportunities for significant energy savings. The IALD believes that EPA may have an opportunity to significantly increase consumer acceptance with only small reductions in efficacy levels required for ENERGY STAR certification.

The IALD recommends that EPA take the following actions in preparation of the next draft of the proposed standard:

1. Devote additional time to broadening the definition of “stakeholders” in this process. Outreach should be extended to key stakeholders of the lighting design community to ensure that the final standard meets the needs of consumers and manufacturers, and promises a high standard of lighting quality. IALD members are accustomed to saving energy without sacrificing lighting quality.
2. Explore more thoroughly the trade-offs among efficacy, color rendering and lighting quality to boost consumer acceptability of products. These factors should be balanced by raising quality-related requirements and reducing efficacy requirements to levels that will maintain lighting quality and encourage the economic manufacture of SSL replacement products.

The IALD is happy to continue working with you and your colleagues to help make the proposed standard a truly useful advance in lighting quality.

Sincerely,

JOHN MARTIN
PUBLIC POLICY

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