



INDEPENDENT TESTING LABORATORIES, INC.
3386 LONGHORN ROAD, BOULDER, CO 80302 USA

PHONE: (303)442-1255 • FAX: (303)449-5274 • E-MAIL: itl@itlboulder.com • WEBSITE: www.itlboulder.com

17 May 2013

page 1 of 1

TO: Energy Star Lighting Program – U.S. Environmental Protection Agency

RE: ITL Comments –Energy Star Program Requirements
Product Specification for Lamps (Light Bulbs)
Version 1.0, Draft 4

Dear Program Manager,

Independent Testing Laboratories, Inc. (ITL) respectfully submits the following comments regarding draft 4 of the Energy Star Program Requirements for Lamps, Version 1.0.

1. Page 10, Section 9.1 – under “Energy Star Requirements” it is stated that “Additionally eight or more units individually shall meet the requirement.” We recommend combining this statement with the sample number requirement in the right column, i.e. “eight of the required ten model samples shall pass”.
2. Page 10, Section 9.1 – under “Energy Star Requirements” minimum lamp efficacy is given in “initial lm/W”, however this term is not used in following pages in reference to “light output”, i.e. “initial lumens” should be listed on page 10 under requirements if the same format is to be used. Consistency between the two versions would help clarification – either keep the reference in the table only, heading only, or both.
3. Page 4, Section 4 - the definitions section should include “initial lm/W” and/or “initial lumens”. The definition should include what “initial” implies. Historically “initial” references the time at which some lamp parameter was initiated, i.e. the initial lumen output for a compact fluorescent lamp would be the lumen output after 100 hours of burn time in the intended operating position – for an LED lamp it would be the lumen output at 0 hours burn time. If “initial” simply refers to the first set of a series of tests, that should be stated.
4. ITL recommends that for each measurement section the sample size and number of lamps that need to meet the requirement be stated together under “supplemental testing guidance” – for clarity.
5. ITL recommends that a detailed summary page(s) – if not already intended for the final specification – be included in Lamps V1.0.

Thank you for your consideration of these comments. Please contact ITL Senior Lighting Engineer Mr. Court Stout at (303) 442-1255 with any questions.