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TO: Taylor Jantz-Sell – U.S. Environmental Protection Agency

RE: ITL Comments –Energy Star Program Requirements  
Product Specification for Lamps (Light Bulbs)  
Version 1.0, Draft 2

Dear Taylor,

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

1. Page 6, table 2 – Under “Beam Angle” and “Lamp Base” attributes it is mentioned that the “... $TMP_{LED}$  is within  $5^{\circ}C$  of the maximum case temperature tested in the corresponding IES LM-80 report”. It is understood that these temperature measurement points are identical, with different terminologies used. The Lamps specification definitions page associates “case temperature” with drivers and ballasts – LM80 states that the  $T_s$  temperature is the case temperature and refers to the temperature of the hottest LED or LED module at the surrogate junction temperature point – perhaps a bit of clarification would help here.
2. Page 3 – definitions – The definitions page includes the definition for a decorative lamp and a directional lamp but not a semi-directional lamp. We recommend adding this definition.
3. Elevated Temperature Life Test, options B and C – the requirement for  $55^{\circ}C$  ( $131^{\circ}F$ ) for the interior apparatus and ambient temperatures respectively seem a bit extreme for the application. It would be interesting to hear more on how this number was determined.

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