

7 December 2011

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TO: Mr. Alex Baker – U.S. Environmental Protection Agency

RE: ITL Comments – Energy Star Program Requirements
Product Specification for Lamps (Light Bulbs)
Version 1.0, Draft 1

Dear Mr. Baker,

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

1. Page 1, 1st bullet beneath table 1 – This bullet mentions lamps that operate on an external ballast, driver or transformer are outside the scope of this specification – one of the examples includes LED replacement lamps for linear fluorescents. We believe further clarification should be added since some LED replacement lamp models are available that do not require external drivers and operate at line voltages.
2. Page 15, left side column – The upper lumen maintenance table lists under “Testing completed” - Maximum Life Claims up to 25,000 hours for 6000 hours of testing – the statement below this first table states that the table below is for life claims beyond 10000 hours – we believe this is an error and should be 25000 hours given the 6000 hour table information above.
3. Page 18, sample size – The last sentence under sample size mentions that “the sample shall be a unique sample for this test” – ITL would recommend adding additional verbiage to further define that the samples utilized for rapid cycle stress testing cannot be used for any other certification testing, i.e. photometrics. It is our opinion that being clear and specific when it comes to items like sample size and use of samples is paramount.
4. Page 21, operating frequency for solid state – It is our opinion that the requirement for solid state operating frequency should match the existing requirement for solid state lighting luminaires as outlined in the Luminaires V1.1 program requirements.
5. Page 22, run-up time – ITL recommends that the requirements for run-up time remain the same in this specification as it is for the source types listed in Luminaires V1.1.

Comments continued from page 1:

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6. Page 30, elevated temperature testing procedure – ITL recommends the following clarifications / additions when the elevated temperature test procedure is added / finalized: Ensure all apparatus options are clearly specified for the appropriate lamp types such as:
- Required equipment
 - Dimensions are clearly listed with spacing between sockets, equipment, etc.
 - All ambient temperature requirements for the elevated temperature testing procedure, rapid cycle stress test, lamp aging, etc. are clearly stated with tolerances.
- Note: All of this information above should be included in this document. Users of this document should not have to reference supplemental testing guidance documents.

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