

Received on April 28, 2011 from LITETRONICS.

Subject : ENERGY STAR Lamps Specification Framework

The following comment has reference to the document in the link below:

http://www.energystar.gov/ia/partners/prod_development/new_specs/downloads/lamps/ES_Lamps_Specification_Framework.pdf

Comments

II (C) 2 : We propose to include CCFL (Cold Cathode Fluorescent Lamp), with an Efficiency of 40 LPW, and Life ranging from 8,000 to 25,000 Hours, in all shapes and bases.

III (b) ii : We disagree to equating all the lamp technology and to come-up with standard and tight start-up time and run-up time. We need to consider the cost and energy benefits that different technologies bring to the market from various technologies. Is run-up time very important for non-critical applications, like flashing signs or Garage outside post lights etc.?

III (c) iii : When calculating the return on investment or cost/life time analysis, it makes sense to include lamp replacement cost for commercial application. We do not think the same formula can apply for residential application, as the cost of replacement of the lamp is low or non existent, in homes and in restaurants where the lamps are easy to reach, and replaced by employees themselves or the home resident.

IV (iv) : We would like to include following questions for discussion

1. The cost associated with Energy Star (ES) testing and approval, and third party testing is too high. It is a big burden for small and medium scale industries. How can we reduce redundant and unnecessary cost burdens it just ends up costing the customer more and making the technology more difficult to justify by the customer?
2. LED technology is evolving and lot of improvements is happening at a faster pace than the time required to get the ES approvals. As the LED improves and model keeps changing, do we need to re-submit the models? if yes, then it is going to be continuous on going task until the LED technology reaches its peak and levels out. This amounts to a huge cost burden for small and medium industries as well as the customers of these products. What do you propose?
3. If we can ES other products for 10000 hours why not LED by keeping the Life rating long ES is prohibiting giving the consumer choices on alternative LED products with CFL even when the LED may have better efficiencies at shorter life times and or lower acquisition costs to the end user ES should not apply different hurdles to different technologies.
4. Higher CCT should qualify automatically if the lowest CCT qualified as per ES rules for LED integral lamp? There are multiple CCT available. Qualification for each CCT will cost a lot of additional money without much real benefit as long as the LED used is from the same manufacturer and the same model with just the color temperature changed of the lower color temperature tested than the high color temperature should automatically get ES because it is always a better efficiency than the lower CCT which qualifies.
5. Mercury Labeling for CFL product packaging : Why both are required such as [the symbol "Hg" within a circle] as well as [Lamp Contains Mercury]. ES should require one or the other not both these regulations tend to add unnecessary cost.