

Email received on April 25, 2011 from Brian Halliwell.

Lights of America appreciates the opportunity to comment on the lamp specification framework. All comments made are relative to the current Energy Star Integral LED lamp specification:

Section II. Scope

- b) Product types
 - i. Lamp shapes

Current Specification:

The BR type lamp configuration is listed within the Directional lamps listed. This is in incorrect call out for a directional lamp. BR lamps are used in the market as floodlights and not for directional use. BR lamps such as a BR30 65W incandescent floodlight or BR30 15W CFL floodlight are not directional light sources for which a BR LED integral lamp is designed to replace. As such, the beam angle is far greater than 65 degrees. As such, these lamps also are not defined by a specific CBCP as a result of the light distribution intended to provide a flood light effect. As such, the current Energy Star integral lamp specification classifying the BR as a directional light source with a required CBCP is not achievable when providing a beam angle or light distribution greater than 65 degrees. This results in the impossibility of obtaining Energy Star approval for a BR LED integral lamp even if all other performance requirements are met. Retail buyers are requesting a replacement for the BR incandescent and CFL but cannot obtain an Energy Star listed alternative due to this requirements.

Proposed Revision:

Remove BR from the directional lamp shape product listing and add a Floodlight shape option with BR as a configuration accepted. This would apply to any lamp providing a beam angle over 65 degrees and would not require a CBCP to be specified. All other performance requirements would remain.

Section III. Energy Efficiency, Performance, and Quality Features

- b) Performance
 - i. Luminous Intensity distribution

Current Specification:

The current standards for Omni-direction lamps, specifically A line configurations, requires a 5% of total flux in 135 -180 degree zone and luminous intensity (cd) at any angle in the 0-135 degree zone shall not differ from the mean intensity for the entire 0-135 degree zone by more than 20%.

Proposed Revision:

The above current specification provides an unfair advantage and actually promotes the use of IP technology relative to the use of remote phosphor technology. This is due to the specification regarding the mean intensity delta over the entire 0-135 degree zone by no more than 20%. Whereas it is agreed to the need for the total % lumen distribution requirement of at least 5% in the 135-180 degree zone and 95% or less in the 0-135 degree zone, for the purpose of emulating the light distribution total lumen flux overall when used in a variety of luminaires, the use of individual LED's in creative and efficient means does not inheritably technology via the phosphor as thru remote phosphor. This request for this revision in this specific specification will not impact any of the other performance specifications within the Energy Star requirements but will enable multiple LED technologies to compete in the market leading to reduced cost and improved market availability of Energy Star rated products.

We appreciate your consideration of these requests. It is my understanding that the independent labs testing for Energy Star LM-80 have many products ready for the market that could be Energy Star listed if not for these few exceptions which would not jeopardize the striving for quality but would instead continue to move the market forward with more options and eventually reduced costing.

Please feel free to contact me at bhalliwell@lightsofamerica.com should you have any questions.

Thank you

Regards,

Brian Halliwell
Vice President Sales and Marketing

Lights of America