

Dear EPA ENERGY STAR,

The Loeb Electric Company is a lighting and electrical distributorship in Central Ohio. We serve counter clients locally and chain retailers nationwide with our lamp replenishment and labor services.

We have invested in capability to assist our customers with incentive capture, and we have experience working with utility rebate programs across the country.

We wholeheartedly support the Commercial Grade label proposed in Draft 2 of the Version 1.0 ENERGY STAR Product Specification for Lamps (Light Bulbs).

Energy Star previously seemed geared more towards residential customers. As noted in Draft 2, commercial accounts have different needs and in many cases more rigorous requirements for their lighting systems.

Testing and labeling lamps under an Energy Star "Commercial" label would simplify product selection, especially when our account managers must fulfill the requirements of utility rebate programs. This is because most programs either list Energy Star as a requirement, or provide more lucrative incentives for products that bear the Energy Star label.

As an ancillary benefit, specific endorsement of commercial products by as broad a standard as Energy Star could lead to greater customer confidence in the lighting products that we sell them.

We are looking forward to the higher standards that Energy Star Commercial can bring, and leveraging this for our customers.

Thank you for your consideration.

Best,  
**Kurtis Meyer**  
Energy & Retrofit Specialist

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