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Ms. Jantz-Sell,

NEEP appreciates the opportunity to provide comment to the ENERGY STAR program as it works to develop a technology neutral specification for replacement lamps. After review of Draft 3 of Version 1.0, we wanted to share a number of reactions below;

1. NEEP supports the exclusion of non-standard and semi-directional lamps from the scope of this product category.
2. NEEP supports the elimination of the Commercial grade designation. We believe reporting additional information through the qualified products list is a better alternative to creating a new labeling scheme, with the potential of confusing customers.
3. NEEP supports the addition of dimming requirements (for those lamps that claim dimmability) to be included in Version 1.0 of this criteria.
 - a) In general, we support ENERGY STAR's approach to differentiate testing requirements for lamps designed to be operated with varying kinds of dimmers/controls (legacy (phase cut) and next generation dimmers (non-phase cut)).
 - b) While it is clear what testing process a lamp designed for phase cut dimming should undergo, it is far less clear what testing process a lamp designed to dim with non-phase cut dimmers should adhere to. "For phase cut compatible lamps, a manufacturer must test on 10 separate dimmers with a certain amount of variability;
 - From at least 3 different manufacturers
 - At least one must be specified for use with energy efficient lighting
 - At least one must be of the following types: Single Phase Shift; Double Phase Shift, Microprocessor with Power Supply, Voltage Compensation, Electronic Low Voltage, and/or Reverse Phase "

Yet the lamps designed to operate with next generation (non-phase cut control device), "shall be tested using only the specified control(s)". ENERGY STAR should clarify what "specified controls" refers to, especially since the exception clause seems to address cases of limited control compatibility.

"If a lamp is compatible with a limited set of dimmers/controls, the limited set of controls must be listed on the packaging and be tested with the lamp against all dimming performance requirements. An asterisk next to "dimmable" on lamp packaging/online product listing marketing materials must be included and point to an "only compatible with ..." statement."

What if a lamp compatible with non-phase cut controls works with dozens of products, shall it be tested on all of those controls?



4. Labeling-

- a) NEEP supports requirement to label lamp packaging as dimmable/non-dimmable.
- b) NEEP supports requirement that Dimmable lamp packaging indicate that the lamp may not be compatible with all dimmers.
- c) "Dimmable lamp packaging shall reference a website providing regularly updated dimmer compatibility information for the lamp model. Lamps that are dimmable with a limited set of controls that elect to test and list compatibility with the limited set of controls must list all compatible controls on packaging." NEEP would again like clarification as to what qualifies as a "limited set" of controls and what doesn't.
- d) We strongly urge ENERGY STAR to develop supporting point-of-purchase (POP) resources to reinforce the message that consumers should not assume compatibility with their existing dimmer systems. It will be also be helpful to remind consumers about the limitations dimmable lamps and dimming systems face, especially in a market of varying technologies being operated together.

Thank you for your consideration of these comments. Please contact me with follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink that reads "David Lis".

David Lis
Appliance Standards Project Manager