

***Kichler Lighting Group comments on the Final Draft Version 4.1 ENERGY
STAR Specification for Residential Light Fixtures,
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Evan Haines
ICF Consulting
9300 Lee Highway
Fairfax, VA 22031

Evan Haines/ICF/EPA,

I have just completed my review of the final draft for Energy Star Qualified Residential Lighting Fixture Program Requirements 4.1, the proposed compliance changes for lighting fixtures. I would like to comment on two areas:

1. Testing Orientation
2. Follow-up Review

Testing Orientation

In Table 3, you are providing lamp/ballast manufacturers the option to indicate one of four lamp positions.

1. Base up
2. Base down
3. 50% base up, 50% base down
4. Horizontal

As a lighting fixture (luminaire) manufacturer, this means I must match the orientation found on the lamp/ballast platform letter of approval with the lamp orientation in my fixture. I suspect this is clear, but I need clarification. What does "50% base up, 50% base down" mean. Does this allow me to use the lamp in either an up or down application, or does it allow me to use the lamp in ALL applications?

It should be noted that a lamp that operates in a base up situation, is probably the most severe, with heat collecting in the ballast. This is typically the "worst-case scenario." If a lamp is tested in this position, why go to the trouble and cost forcing the lamp manufacturer to conduct tests in the other positions?

As a final suggestion, why not add "#5 - All" to your list? This would allow the luminaire manufacturer to file fewer forms. With orientation now an element of division, all fixture manufacturers will be forced to quadruple their paperwork to

Energy Star. I suspect this will take Energy Star longer to process new qualifications.

Follow-up Review

Not included in this document is the continuing Energy Star program of confirming performance for items that are labeled and advertised as Energy Star qualified. I believe it is crucial that responsibilities for review are defined among the affected parties.

As a manufacturer of the lighting fixture, Energy Star should hold me responsible for those aspects of the product for which I contribute.

- Proper labeling
- Proper ballast replacement information
- Valid warranty information
- Correct lamp and ballast use

I want assurances and clarifications that indicate the original holder of the Platform Letter for the particular Lamp/Ballast combination used in my fixture is responsible for its performance. Because I am one of scores of fixture manufacturers using this particular lamp/ballast combination, it would be economically foolish to force these confirmation costs on me (or other luminaire manufacturers.) Those costs would of course need to be passed to the consumer who will soon associate Energy Star product with expensive prices. In addition, fixture manufacturers have little or no information covering the performance of the ballast or light bulb. We could only act as intermediary between Energy Star and the platform letter holder. Right now, responsibility is nebulous. A clear statement of ownership is needed.

If these areas could be adjusted, I believe you would have a very solid and usable document.

Thank you for the opportunity to comment. Please feel free to pass my comments on to anyone interested. I am of course available for clarification.

Jeffrey R. Dross
Senior Product Manager
Kichler Lighting Group
P. O. Box 318010
Cleveland, Ohio 44131-8010
jdross@kichler.com