

September 19, 2007

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Sent electronically to baker.alex@epa.gov and banwell.peter@epa.gov

Dear Alex and Peter,

We appreciate the opportunity to provide further comments on behalf of the Lamp and Luminaire Sections of the National Electrical Manufacturers Association (NEMA) on the proposed final draft of revisions to the Energy Star Residential Light Fixture (RLF) specification. As communicated in the August 13 comments on the earlier draft, we recognize Energy Star's interest in expanding the scope of the RLF program to encompass fixtures and lamps using the GU-24 socket and base. However, we remain troubled and dissatisfied with Energy Star's inability to harmonize proposed testing requirements for GU-24 lamps. Moreover, we soundly reject the proposal that manufacturers should abandon a labeling scheme for mercury-containing lamps that was worked out with state regulatory authorities and has been implemented nationwide. We look forward to working with you to achieve reasonable and workable solutions to these serious problems. To that end, we provide the following comments and look forward to further discussions with agency officials to come to workable solutions at the earliest possible date.

Accelerated Cycling, Thermal and Voltage (ACTV) Stress Test

On testing, you have proposed an entirely different test procedure – that to date has not even been fully made available or explained to manufacturers – for “GU-24” CFLs than the Department of Energy has been proposing for the Energy Star CFL program for over a year.

The elevated temperature life testing procedures specified by DOE will be more stringent than the ACTV cycle test in revealing “inadequate circuit designs, manufacturing problems, defective materials or components, and poorly performing products,” which are the stated goals of the ACTV, according to your September 5 cover letter.

If each program remains determined to proceed on its own separate path, manufacturers would be required to test the same GU-24 lamp twice in order to qualify under each program. While we respect and applaud the agencies' determination to ensure Energy Star products meet stringent performance requirements, this double testing is completely unacceptable. The agencies must agree on a single test method.

A simple solution would be for the Energy Star RLF program to require GU-24 integrated CFLs be listed as qualified under the Energy Star CFL program, Version 4.0. As noted, Version 4.0 will have stringent high-heat environment testing requirements, in addition to periodic product requalification requirements, third-party quality assurance testing and verification requirements supported by technical and research working groups that identify products for testing and new test procedures. Listing the GU-24 products under the Energy Star CFL program would effectively eliminate Table 3 from the RLF document.

Product Packaging and Lamp Labeling for Consumer Awareness

NEMA lamp and luminaire manufacturers have already implemented nationwide changes to their package labeling to indicate the presence of a mercury-containing lamp, to advise the consumer that recycling and disposal requirements exist, and to direct the consumer to an established non-governmental website, www.lamprecycle.org, for more information. This labeling scheme was worked out cooperatively through years of negotiations with state *regulators*. As a result, use of the lamprecycle.org website is currently an element of state labeling requirements that we simply cannot change on our own initiative. Since our manufacturers do not label product for one state, the scheme has been adopted as best practice and implemented nationwide.

In the proposal issued for public comment on September 5, EPA Energy Star suggests the lamp and luminaire manufacturers should again change their packaging to include reference to a new EPA website. The site www.lamprecycle.org, which has existed for several years and is a well-known resource for lamp consumers of all kinds, is promoted actively not only by lighting manufacturers but also and state and local governments, and contains a prominent hyperlink to this new EPA website. In short, we are willing to work with EPA to promote the new website, but our manufacturers reject the requirement that they should shoulder the cost to change their packaging once again. *Energy Star is not a regulatory program, it is a market transformation program.* If EPA is resolute in its determination to promote the EPA web site, we propose that Energy Star partners be given the option to use either lamprecycle.org or the EPA site on their package.

If you are not willing to accept this compromise, we will request a meeting with senior officials in the Agency to raise our objections.

In addition, we recommend the following technical corrections to the draft Table 3.

Transient Protection

The proposed Energy Star requirement for transient protection is incorrect. ANSI C62.41 is a guide, not a standard. The correct wording should be the same as earlier wording in V4.0 as follows: “Transient Protection per ANSI C82.11b, paragraph 5.10.1 (100kHz Ring Wave, 2.5kV, both common mode and differential mode, 7 strikes)”

End of Life (EOL) Protection

The Energy Star requirement should be changed to read: “All integrated lamps sized T5 and smaller must provide end of life protection either in the ballast or the discharge tube itself.”

The method of measurement should be changed to read: “UL 1993, 2nd Edition upon its effective date.”

The required documentation should be changed to read:

Provide:

For all T5 and smaller sized integrated lamps: provide an engineering description and circuit diagram, if necessary, outlining the scheme that is used to provide the EOL function within the integrated lamp.

As written, the EOL protection is required to be in the ballast, thus limiting the design choices of the manufacturer. The next edition of UL 1993 specifies more comprehensive test criteria that have to be met under actual EOL conditions, rather than specify a limited number of circuit oriented methods for EOL protection. The IEC standard referenced in the draft is designed for systems that employ discrete ballasts that are used with plug-in type fluorescent lamps. It is therefore not adequately relevant for integral self-ballasted lamps.

Safety – Ballast and “Non Edison Base Fluorescent Adapters”

This performance characteristic should be changed to read simply “Safety”.

The Energy Star requirement should be changed to read: “Product must comply with UL 1993.”

The required documentation should be changed to read:

Provide:

File # for the respective product as listed by the appropriate OSHA NRTL laboratory and one of the following:

- 1) Letter or statement from an OSHA NRTL facility indicating that the product has meet the UL 1993 requirements.
- 2) Web link to the manufacturer's listed product at the OSHA NRTL laboratory which carried out the safety tests.
- 3) Print out of the OSHA NRTL website showing the listed product.

The suggested changes make it clear what the safety requirement is and what documentation is commonly used to prove compliance. The cover page of a test report, for example, may indicate the model(s) tested, but will rarely indicate the pass/fail status of a given model.

Thank you for your serious consideration of our comments. I look forward to continuing to work with you to make sure Version 4.1 is a success.

Sincerely,

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