

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

July 23, 2007

Dear Residential Light Fixture Manufacturer or Other Interested Party:

In May 2006 the U.S. Environmental Protection Agency (EPA) released a directional draft of the revised ENERGY STAR Version 4.1 Residential Light Fixture (RLF) specification for stakeholder review and comment. Based on discussions with industry stakeholders on this document, EPA released Draft 1 of the Version 4.1 specification on January 15, 2007 for review and comment. The proposed revisions focused on new requirements for GU-24 products qualified as part of a fixture (i.e. for GU-24 based lamps shipped with a qualifying ENERGY STAR RLF). EPA received several comments on this proposal and is now pleased to provide you with a Final Draft of the specification for review and comment. Please note that this is the final opportunity to comment on the specification prior to completion.

Light fixture manufacturers are rapidly adopting GU-24 integrated lamps in their fixture designs to qualify products under the ENERGY STAR RLF Program. To date over 1,500 fixture models use GU-24 products as their primary technology for compliance. It is critical to the ongoing success of the ENERGY STAR Residential Light Fixture Program and for the ultimate success of this new technology that these products meet or exceed consumer expectations. To ensure high quality performance in support of an expanded market for these products, EPA recognizes that some adjustments to the ENERGY STAR program requirements are warranted.

With this letter, EPA is proposing to set requirements for GU-24 units intended for use with ENERGY STAR qualified fixtures. Stakeholders will notice the following key changes in this latest version:

- **Accelerated Life Test (ALT):** The ALT will be required for all GU-24 products applying for ENERGY STAR qualification.
- **Standardized Base:** This draft contains a reference to the pending GU-24 ANSI Standard. EPA intends to adopt this standard once it is finalized.
- **Testing Orientation:** To give fixture manufacturers more accurate information regarding performance when sourcing GU-24 integrated lamps for their products, EPA is adding a testing orientation reporting requirement. GU-24 manufacturers will continue to have the option to test in either base up or base down orientations as in the past, but this information will now be displayed on Platform Letters of Approval.

- **Maximum Mercury Content:** EPA recognizes the growing public concern about products containing mercury and international movement on consumer education. As such we are proposing to adopt mercury content limits that are inline with those voluntarily promoted by the National Electrical Manufacturers Association (NEMA).

With the addition of these requirements, GU-24 based lamps tested to demonstrate compliance with the ENERGY STAR RLF specification are known to work across all ENERGY STAR qualified fixtures and are generally considered ENERGY STAR qualified. With the exception of the requirements outlined above, no additional changes are being proposed for the remaining sections, as presented in the Draft 1 document. More details regarding EPA's rationale for making these changes are included in note boxes found throughout the document.

To allow sufficient time for labs to begin offering the Accelerated Life Test, EPA is proposing that the new GU-24 requirements be mandatory as of August 1, 2008.

To facilitate review of the changes being proposed in this Final Draft version, Table 3: *GU-24 Based Integrated Fluorescent Lamps* is attached for review and comment. Once EPA finalizes these requirements, Table 3 will be incorporated into the larger specification document.

Stakeholders are encouraged to submit comments on the Final Draft specification to Evan Haines, ICF International, at ehaines@icfi.com by **August 13, 2007**. All comments will be posted to the ENERGY STAR Product Development web site unless the submitter requests that their comments remain confidential. If you support the Final Draft specification, please state this in writing. It is equally important that EPA understands which portions of the draft specification meet with stakeholder approval, in addition to identifying the sections that may need further revision.

To track EPA's progress revising the ENERGY STAR Version 4.1 RLF specification, visit the ENERGY STAR Product Development web site at www.energystar.gov/productdevelopment and click on "Revisions to Existing Specifications".

On behalf of EPA, we appreciate your participation in this revision process and look forward to working with you to finalize these new program requirements. If you have any questions or concerns, please feel free to contact me at baker.alex@epa.gov or (202) 343-9272. Thank you for your continued support of ENERGY STAR.

Respectfully,



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