

ENERGY STAR® Lamps (“Light Bulbs”)

Product Specification Framework

March 2011

Response to request for comments

If the Energy Star goal is to move to a “technology neutral” specification for lamps, then we believe that a different approach to certification should be considered. Consumers shop for light bulbs, not specific technologies, and the Energy Star label should mean the same regardless of the technology used.

Having a different standard based on the technology used dilutes the meaning of the Energy Star brand. It also is confusing, as consumers will not be able to objectively compare lamps when the standard for the Energy Star label means something different for a CFL, halogen or LED lamp.

The current differentiation in performance standards hold LED lamps to a much higher standard than CFLs, and one that takes 6 times as long in testing to achieve. Combining the standards should mean that they are the same, and the current proposal still differentiates by technology.

Why are LED lamps held to a higher standard, such as a 3 year warranty (instead of only 2 years for CFLs) or 6000 hours of life testing with 91%+ lumen maintenance (instead of 1000 hours and 90% for CFLs)? If the goal is to have a uniform standard that helps consumers understand what the Energy Star label means, then there should not be different standards for each technology.

Although there are a number of issues that would have to be resolved, perhaps by reaching different performance levels, we believe that a true technology neutral standard should be considered for all metrics.

- Shape
- Efficacy
- Lumen maintenance testing
- Warranty
- Color
- Dimming
- Other metrics
- New ones to consider...e.g. lumens/\$

We appreciate the opportunity to offer comments on this, and would be happy to contribute to a revision of the standard to achieve a true “technology neutral” standard for lamps.