

TCP Comments 10.14.05

TCP appreciates the opportunity to attend the Stakeholder meeting and comment on the first draft of the 2006 Energy Star CFL Specification.

CCT

The introduction of mandatory/allowable color temperatures in the new spec is ill-advised without a standardized, consumer friendly word description of the color of light. A Kelvin temperature means nothing to the average retail consumer. Consumers will be no closer to understanding or matching colors without a standard system in place. Additionally, an allowance should be included for color temperatures other than those specified in the draft. Verbiage similar to the current spec should be included, i.e., "Between 2700K and 3000K. If not, packaging should clearly state the temperature and color of product (cool or warm)."

Interim Life Testing

New to the spec is the addition of a self-certified product failure report if a test experiences 2 product failures before 40% of rated life. The reason for this is unclear. Under what circumstances will a test with 2 failing lamps before 40% be accepted? Additionally, what type of reporting is being required? Is the lab performing the life testing required to submit the report? Or is the bulb to be sent back to the manufacturer to be analyzed by the manufacturer's quality manager? We would like to see more detail regarding reporting.

Elevated Temp Testing Procedure

TCP is in agreement with comments made on behalf of NEMA at the Stakeholders meeting. This testing is needed; however, it is expensive and impractical for large scale testing. Further, without industry test method standards, there is likely to be significant variation within a lab as well as lab-to-lab variation resulting in limited value in the data. As written, the value of the data is outweighed by the substantial expense of building and testing to this requirement.

THIRD PARTY TESTING & VERIFICATION PROGRAM:

Product Selection Committee

Manufacturing is not well represented in product selection committee. Additionally, this one manufacturer with his "unbiased view" will have access to all selection information and test data which the rest of the manufacturers will not. We request that you consider adding more manufacturers to this committee.

Product Nominations

TCP feels strongly that the “nomination” process should be completely removed from the spec. There is great room for misuse of this process. Nominating a manufacturer for evaluation will quickly become a marketing tool for manufacturers to point fingers. The results of the subsequent test will be inconsequential. What will be used is the insinuation of poor quality on the part of a manufacturer who is repeatedly nominated for testing by competing manufacturers who want their retail business.

Manufacturers, as the party responsible for payment, should be able to use the lab of their choosing. This verification program is an expensive requirement and because a manufacturer can be required to test 6 times a year, with some parties arguing for more, they must be allowed to make testing decisions in a financially responsible manner. This is a great financial expense to manufacturers and begs the larger question that at what point is it too costly to participate in the Energy Star program?

With this new spec it becomes the responsibility of the manufacturer to pay 100% of the verification testing costs. As such, non-paying utility groups and other stakeholders are not entitled to receive this data at no cost. The “nominal fee” discussed at the February working group meeting should be charged to these interested parties and used to defray the cost of the testing.

Also included in the new spec is an appeals process for failing lamps. We would like to see clarification on the criteria that will be used to evaluate appeals.

TCP feels the Energy Star program is a valuable tool that helps consumers make informed choices when purchasing products. Thanks to the Energy Star label and the success of the Change a Light, Change the World campaign, CFL's are finding their way into more homes across the country.

It is our hope that the DOE will take a broad spectrum approach in future revisions. There are many other energy efficient light sources available in today's market, specifically cold cathode and LED products. We would like to see these items included in future specifications.

DOE has done a good job of protecting the equity built into the Energy Star logo. Manufacturing partners are producing quality products that help maintain that brand. It is disturbing that TCP has received an increasing number of calls from programs that will only accept PEARL tested or “PEARL qualified” products. Any program disregarding the Energy Star listing and instead requiring PEARL testing completely undermines the value of the Energy Star brand. It is our hope that the DOE will continue to advise such groups that this is a misuse of the verification program.

Thank you for the opportunity to submit comments.