Dennis Arnold, Thomas Lighting – August 8, 2003

It does not appear that any currently qualified Thomas Lighting fixtures will be effected by the proposed changes. I don't necessarily have a problem with any of the proposals; so overall, I'd approve V3.2 as is. However, I do have a few questions / comments.

First, I'm surprise V3.2 does not mention the NEMA/ALA ballast matrix. Is that intentional? It may be addressed in the revised QPI instructions, but it seems V3.2 should at least have a footnote with regards to the ANSI or IESNA requirement in Table 3 - Reference Standards. Unless, of course, it is EPA's intention to not accept the data provided in the matrix as a substitute for the manufacturer's test data, which is really the heart of my question. Will EPA continue to accept the NEMA/ALA lamp/ballast matrix in lieu of fixture-specific test data?

I understand LRCs issues with ballast maximum case temperature, but I'm very surprised that they are including linear. I understand that the emphasis is on high-risk fixtures at this time, and I doubt that a 2-lamp F32T8 kitchen ceiling fixture with a wood frame would be considered high risk. I also understand that the temperature test data is only required at EPAs request. However, I do feel that in the future the requirement to provide ballast temperature data be defined in the Specification on a category-specific basis.

The comment about needing a laboratory test report even on fixtures that are exempt from UL1598 bothers me. I can provide temperature test data from our lab in a matter or days. But if EPA requires independent test data from an accredited lab, then we are talking about weeks, plus the expense on our part to provide it. If we're using a Class P ballast, and the fixture will continually operate without interruption, doesn't that mitigate the need for temperature testing? UL seems to think so. That's why those fixtures are exempt. I thought the whole reason for the NEMA/ALA matrix was to allow fixture manufacturers to move away from independent testing. Having said that, I do agree with the maximum case temperature requirement in some applications. I just think it needs to be better defined when it's acceptable to fill out the QPI with data taken from the ballast manufacturer's spec sheet versus a NVLAP report.

Apparently one of the main reasons for V3.2 is to make amendments for retrofit recessed kits. As a recessed manufacturer, this really bothers me. We are required to provide myriad test data to UL for every housing, trim and lamp combination. Developing a new recessed housing is a Big Deal. If the retrofit kit manufacturers are required to provide that same UL test data for every housing they are claiming it's suitable to be used with, then that's fine.
Energy Star will be responsible for the retrofit kit's durability and efficacy but you cannot take responsibility for UL testing with every possible housing combination. It's up to the kit manufacturer to do that, and I'm concerned that a lot of products will be thrown on the market with the blessing of Energy Star that may or may not be acceptable from a UL standpoint. Maybe I'm over overreacting, but I can envision the customer field complaint regarding our recessed housing that has been fitted with an untested retrofit kit. We can't control what lamp a customer installs, or even what trim is used, but when a homeowner purchases a retrofit kit that is supposed to work with another Listed product from a different manufacturer they need to have a high degree of assurance that the combination has been tested for safety.

Indoor product packaging requirements, table-1: Lamp life and CCT stated on the product label? Surely not on linear fluorescent supplied without a lamp? We currently say "USE F32T8 LAMPS". Does that need to change?

Lamp socket compatibility - table 2A: This is only noted in the outdoor section, so I assume it only applies to CFL and not linear, although it does not state that. T12 and T8 lamps both use medium bi-pin lampholders. A T12 lamp will typically start with a T8 electronic ballast even though it not intended for use with it. Our linear strips are rated for damp locations, so it's conceivable that

someone could use it outdoors. If the lamp compatibility subject is only intended for CFLs it should be stated.

The outdoor section (table 2A) does not repeat any of the performance characteristics for electronic ballasts from the indoor section (table 1). Is it assumed that fixtures qualified under table 2A must also adhere to the requirements in table 1? If so, that should be stated in 2A. If not, am I to understand that outdoor fixtures do NOT require an FCC class B ballast? In fact, a 13W 2-pin lamp with a choke magnetic ballast meets the LPW spec. That's acceptable for outdoor qualification?

Thanks!
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