



American Lighting Association (ALA) Comments
on the
ENERGY STAR® Program Requirements for Luminaires
Version 1.0, Final Draft

The comments below are being submitted in addition to comments provided to Energy Star by ALA members who are involved in the manufacture and sale of residential lighting products. We appreciate the efforts that ENERGY STAR is making to respond and to change the Requirements for Luminaires to ensure a quality energy-efficient lighting product for the consumer. Our intent with these comments is to particularly call attention to those Version 1.0, Final Draft requirements which we feel will not only be unnecessarily costly or burdensome for our members but also for the consumers who are ultimately required to bear any higher costs. To our members this is critical as the likely results are fewer ENERGY STAR luminaires being available, higher costs for those luminaires and therefore fewer luminaires sold into a market which must and could be transformed if lighting energy is to be reduced.

Page 11. It is helpful to see the fluorescent lamp efficacy requirement remain at 65 lpw even with the proposed scheduled rise to 70 lpw after 9/1/2013. We wish to see improved color rendering for fluorescent products for residential use in order to improve the consumer adoption rate of fluorescent lighting since, according to our members, color rendering remains a barrier to CFL residential use. Further, we understand that sales of CFL products have gone down since 2007 with the CFL market share remaining under 20% even though CFL prices have decreased.

Requiring higher lpw in this case works against the consumer adoption of CFLs because increasing lamp lpw typically means poorer color rendering. We ask ENERGY STAR to revisit this requirement again in early 2013 as well as considering higher CRI values for qualified products. In our view, a minimum CRI (Ra) of 80 (Page 21) is too low for broad consumer acceptance. We recommend a minimum value of Ra = 90 for both fluorescent and LED light sources.

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Page 14. Under-Cabinet and Cove-Mount Luminaires. Lumen density requirements have little to do with the successful application of these products because of varying space dimensions, material reflectance characteristics and designer preferences. We find, for example, more consumer concern about reflected glare and lamp images in shiny counter

materials than light distribution concerns. We urge, especially in view of the rapidly changing LED technology, that the lumen density requirements be left to the manufacturers of these products who may wish to vary the light distribution according to whether the product is to be used for cove lighting, under-cabinet lighting, some combination of these situations or even where on-site adjustability might provide the best solution.

As our previous comments have expressed, we remain concerned about the testing and verification requirements for ENERGY STAR luminaires even though these are not specifically a part of this Final Draft document. The proposed increase in the annual verification testing from 1% to 10% of the models is costly and burdensome. This added cost and complexity, all done at the manufacturer's expense, is certain to reduce the types of luminaires available to consumers and limit participation in the ENERGY STAR program. Residential luminaires, particularly the non-directional designs, are uncomplicated straightforward electrical devices which vary little from sample-to-sample. That should be taken into account in order to maintain a variety of products in the market which benefits both consumers and the ENERGY STAR Program. The ALA recommends maintaining the present 1% sample rate.

The ALA remains ready to assist ENERGY STAR in this ongoing important industry effort. Please contact Terry McGowan at lighting@ieee.org or 216-291-1884 with any questions regarding these comments.

A handwritten signature in black ink, appearing to read "Terry McGowan", is displayed on a light gray background.

Terry McGowan
Director, Engineering & Technology
American Lighting Association