

EPA ENERGY STAR
Lighting Program Manager

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In past years on Energy Star RLF program EPA was had a big mistake almost mix-up that 75% Energy Star fixture's market included out-door which was GU-24 line voltage socket The RLF V4.3 criteria allowed an integral source of GU-24 fluorescent lamp then Energy Star & Non-ES GU-24 products are roved in Country.

Agency is discuss may let ceiling fan light kits with 3 or more heads, chandeliers, decorative pendants and wall sconces, outdoor porch, to adjusting minimum light output requirement per/head.

If Energy Star allowed change that the manufacturer/distributor will be self-explanation to have moved some more current requirements changes for that categories. They are able to use lower minimum light output efficacy source per/head as following:

The lower efficacy source output lamp is able to use integral lamp.
The ballast/drive no longer needs to meet V 1.0 shall replacement requirement.

The Hornogenous Materials in lamps/fixture do not need to care about IEC-62321 mercury shall met RoHS 2003 WUV 0.1% requirement.

The lamp holder do not need to use pin-based, and do not need to meet 65 minimum lumens output per watt, do not need to meet the dimming able ballast's PFC shall >0.90.

No longer needs to meet Title 24 Part 6 in Section 119, 131~133, and 150(K)
One fixture with 2 and more lights (or one room have two fixtures) shall have dimming control to 30%. That was designed for lumen 800 x 30% = 240 lumen output.

The ceiling fan lighting kits and decorative pendant, outdoor porch may have choice to select that reversed dome style as attachment lighting kit to added on the ceiling fan which as same as ceiling surface mount. It use T5 circular efficacy >75 lumens per watt, with 2GX13 pin-based lamp holder, able to connect AC on line phase cut dimmer, rated by replaceable dimmable ballast's adapter, meets PFC>90 & RoHS 2003 WUV 0.1% mercury limitation requirements.

That will be saved cost of two heads on one ceiling fan light kit including saved decorative glass cost. Also will be help re-cycle and reducing heat for climatic of CO₂. The chandelier should close out of category from current V1.1

If V1.2 allow Source Efficacy per/head reduce to 450~250 x 30% dimming = 140~80 lumen.

Please pay attention that the CFL rated power on dim position once low than 3.0W the lamp will be flicker or locked by safety protection. The CFL less than 10W and lower won't achieve 60 minimum lumens output per watt.

A lot of current rules in luminaires V1.1 will be break by manufacturer/distributor of ceiling fan light kits with 3 or more heads, chandeliers, decorative pendants and wall sconces, outdoor porch categories.

However EPA will be increasing source efficacy that must be have minimum 900 lumens per/lamp, 70 lumens output per watt may be schedule to go into effect on September 1, 2014 by Version 2.0.

From now count just had one more year those *non-directional* luminaires as mentioned will be still have problems as same as this time. Than V 1.2 proposed change *just* adjusting *Source Efficacy per/head* does concerns for one year ? Or is who need it?

We could not have high/low level per/lamp source efficacy in one specification. Please do not have worse worry change again on luminaires V1.2 for lower lumen out-put per/head for that decorative and *non-directional* luminaires.

This comment is able to post.

c.c.to Mr. Hernandez

Best Regard

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