

January 11, 2011

Alex Baker
Lighting Program Manager, ENERGY STAR

RE: ENERGY STAR Program Requirements – Version 1.0, FINAL DRAFT

Mr. Baker,

In reading through the draft, it is apparent that many of the main concerns that Brownlee, and other lighting manufacturers brought to your attention have been addressed. However, there are two specific items that have yet to be finalized that will directly affect Brownlee Lighting, and other smaller lighting manufacturers.

First, the new lamp and ballast matrices have not been completed. We are fast approaching yet another deadline of continuing the listing for our current ENERGY STAR qualified offerings, with no idea what will or will not be approved components. The Certification Bodies cannot provide any guidance in this area, since they have no direction from the EPA. All we have received in answer to our questions has been weak assurances that “something” will be done.

Furthermore, the guidelines for Verification testing still have not spelled out exactly how many fixtures are to be tested. We have been told on numerous occasions that roughly 10% of the listed products will be tested. What has not been established, however, is whether that is 10% of the total offerings of a manufacturer or 10% of the manufacturers will have a product tested. We have asked that question directly, and have not gotten a satisfactory answer. I can assure you, that if it is indeed 10% of each manufacturer’s listed products, the number of products offered will be severely curtailed. The expense for the Verification testing would be enormous. Our sales of Energy Star fixtures could never justify this expense.

The lamp and ballast matrices are perhaps the most important tools in selecting components for qualifying fixtures, and to have no indication of which components we can continue to use are creating delays in our planning. Likewise, the lack of knowledge about the Verification Testing hinders which fixtures, and how many varying wattages we will continue to offer. We are stuck waiting for specifications when we should be planning for new fixtures to be added to our already large ENERGY STAR lineup. We need these decisions sooner rather than later, so that we can formulate a plan to tackle the new requirements.

Respectfully Submitted,

Curt Brownlee
President
Brownlee Lighting
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