

**Email received on January 13, 2011 from Edmond Daniels.**

I am writing to you regarding the In Situ Temperature Measurement Test (ISTMT) on pages 18-22 of the ENERGY STAR® Manufacturer's Guide for Qualifying Solid State Lighting Luminaires – Version 2.1. Specifically, regarding the formula in SCENARIO 3 on page 22.

It is well known in the LED lighting world that the cooler the LED runs, the longer it will last and the better it will perform, including improved lumen maintenance. LM-80 stipulates that LEDs be tested for 6000 hours at 55C, 85C, and a third temp that the manufacturer selects. We, as an LED luminaire manufacturer, are very conscious of the importance of thermal management to provide our customers with long lasting products. I have a situation where the formula on page 22 prohibits me from taking advantage of my exceptionally cool operating product. See below.

L<sub>below</sub>=94

L<sub>above</sub>=93

T<sub>sbelow</sub>=55

T<sub>sabove</sub>=85

If T<sub>MPLed</sub> is 55, then L<sub>tmp</sub> is 94%, good for 25,000 hours. If T<sub>MPLed</sub> is 50, then L<sub>tmp</sub> is 94.2%, good for 35,000 hours; however, according to Craig Haglund of DNR International, although the product runs below 55C, the EPA will not consider temps below the minimum tested temp of 55C and therefore, 94% would be the best lumen maintenance for my product no matter how much cooler than 55C I operate it. This doesn't make sense and again, prohibits me from claiming 35,000 hour life time. I think this policy should be reconsidered.

Thanks,