

Email received on October 21, 2010 from David Shiller.

Dear EPA and ICFL,

The following are MaxLite's formal comments on the Luminaires Draft 2 specification:

- MaxLite strongly opposes the new testing and verification requirement that 10% of qualified models be tested per year at manufacturer's expense. This is more than a 10 fold increase from current QA4 testing of less than 1% of models. Many E* partners are talking about reducing their number of E* SKU's if EPA moves forward with a 10% of model requirement. It is onerous and excessively expensive. Two or three percent of qualified models would be more than sufficient per year.
- Page 11, we strongly support the 65lpW efficacy requirement.
- Page 14, we strongly support the start and run up time requirements applied to HID sources.
- Page 16, we support allowing the longer lifetime claims when supported by LM-80 data
- Page 19, we support allowing testing Options 1 AND 2 for SSL.
- Page 20, we support the addition of 5000K for commercial. We oppose the 4000K option for SSL, in favor of the long time industry standard of 4100K. 4000K will make CCT matching within a space more difficult with 4100K sources. There is no need for 4000K.
- Page 21, we support dropping R9 from CRI.
- Page 22, we support the color angular uniformity requirements, and the chromaticity shift maximums.
- Page 23, we support allowing the exceptions on lamp labeling for lamps too small to label. We support the adding lamp shipment requirements to recessed fluorescent downlights.
- Page 25, we support the start and run up times proposed.
- Page 27, we support the proposed dimming performance requirements, but suggest EPA have CFL and SSL go down further to 30%.
- Page 28, we question the wisdom of eliminating the photosensor requirement on outdoor, but we welcome the cost-savings.
- Page 29, we strongly support the nominal power factor for fluorescent residential fixtures, and HPF for commercial fixtures.
- Page 31, we support the higher off-state limits proposed.
- Page 33, we support the removable driver requirements and the noise during dimming limits.
- Page 36, we strongly oppose requiring EPA-approved labs for the heat testing requirement. This will dramatically increase costs and potentially reduce the number of SKU's that partners submit for qualification. This is onerous and unnecessarily expensive.
- Page 41, we support the RoHS requirements.
- Page 42, we support removing the "unconditional" from the warranty requirements.

Thank you for the many prudent compromises made in Draft 2. EPA has demonstrated that it is listening to its manufacturer partners. We strongly suggest EPA apply the same wisdom to the three highlighted issues above, which remain of major concern to many in the industry. Thank you for the opportunity to comment.

Best regards,

David Shiller

V.P. of Sales, New Business Development

MAXLITE