

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

September 8, 2003

Dear ENERGY STAR<sup>®</sup> Residential Light Fixture Partners and Other Interested Parties:

EPA welcomes your input on the following **Final Draft** ENERGY STAR<sup>®</sup> Residential Light Fixture (RLF) Version 3.2 specification. This document represents EPA's final Draft proposal for the criteria and testing procedures that manufacturers will need to abide by in order to qualify products as ENERGY STAR. It is intended that once final, this specification will replace the current Version 3.1 specification, effective September 19, 2003.

On behalf of EPA, I would like to thank everyone for reviewing and providing comments on the Draft 1 specification. These comments were of great assistance in modifying the specification for release of this Final Draft document. Throughout the document, the note boxes have been updated to address specific industry comments and concerns and provide EPA's rationale behind making revisions to the Draft 1 specification.

This Final Draft specification incorporates the following changes:

- In Section I, the language from the pigtail definition that required pigtail connections be non-reversible has been removed.
- The term "instant-on" has been added to the Lamp Start Time requirement in Table 1 when referring to magnetically ballasted compact fluorescent fixtures, in order to be consistent with the NEMA/ALA Lamp Matrix.
- The maximum ballast operating case temperature for optimal performance requirement in Tables 1 and 3 has been expanded upon to clarify that every fixture type eligible for ENERGY STAR qualification must meet this requirement.
- Language has been added to clarify that manufacturers should test the maximum ballast case temperature for performance after the fixture has been in operation for at least 7.5 hours in Table 3.
- To clarify that it is not EPA's intent that testing for maximum ballast operating case temperature for performance may only be completed by a NVLAP accredited laboratory, a list of acceptable testing facilities is now included in Table 3.
- Language has been added to clarify when it is acceptable to provide maximum ballast operating case temperature for performance data per UL 1598.
- Lamp Life and Electromagnetic and Radio Frequency Interference requirements from Table 1 (Indoor fixtures) have been added to Table 2A; qualifying outdoor fixtures must also meet these performance characteristics.
- Reference to the NEMA/ALA Lamp and Ballast Matrix, as a source of test data, has been added to Section 4, Part C of the specification.

**All interested parties will have until September 15, 2003 to submit final comments on this Version 3.2 specification.** It is EPA's intention to finalize this Version 3.2 specification as soon as

discussions with stakeholders are complete. The Final Version 3.2 specification will define all specification requirements that RLF manufacturers must abide by in order to qualify and label a product as ENERGY STAR. Once the specification is finalized, existing RLF partners will not be required to resign a Partnership Agreement to continue their participation. **However, as of September 19, 2003, only those models that meet all of the new Version 3.2 requirements can continue to qualify.** Existing models that are not able to meet the requirements of the new Version 3.2 specification will no longer qualify as ENERGY STAR, and will be removed from the Qualified Products List on the ENERGY STAR Web site after the partner has been notified.

The exchange of ideas and information among EPA, industry, and other interested parties is critical to the success of ENERGY STAR. As such, you are strongly encouraged to provide prompt feedback. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests that their comments remain confidential. If you support the Final Draft Version 3.2 specification, or do not wish to comment, please state this in writing or via email. It is equally important that EPA understand which portions of the draft specification meet with stakeholder approval, in addition to identifying the sections that may need further revision.

To track EPA's progress in revising the ENERGY STAR residential light fixture specification and to review comments, visit the Product Development Web site at [www.energystar.gov/productdevelopment](http://www.energystar.gov/productdevelopment) and click on "Revisions to Existing Product Specifications" on the right navigation bar.

**We encourage you to review this Final Draft Version 3.2 specification and provide comments by September 15, 2003.** Comments should be sent to Meghan Hoye, ICF Consulting, at [mhoye@icfconsulting.com](mailto:mhoye@icfconsulting.com). If you have any questions or concerns about this process, please feel free to contact Ms. Hoye at (703) 934-3089.

Thank you for taking the time to review this final draft specification. I look forward to working with you during the next few months.

Sincerely,



David Shiller  
EPA Program Manager  
ENERGY STAR for Residential Light Fixtures