



January 6, 2011

U.S. Environmental Protection Agency
Mr. Alex Baker
Lighting Program Manager, ENERGY STAR

Dear Alex,

After having reviewed the latest Energy Star Program Requirements for Luminaires, Ver. 1.0-Final Draft, we felt that we had a reasonably good understanding of the categories "Directional" and "Non-Directional" in terms of defining placement of most of our current residential lighting products.

However, when we called Kate Buck with some questions, and were subsequently referred to Kuuipo for further explanation, we learned that all the basic assumptions we made were wrong.

We were in the process of developing some new decorative residential lighting products such as pendants, sconces, ceiling fixtures, portable, and outdoor lanterns using LED technology, and wrongly assumed they fell into the "Non-Directional" category. As it was explained to us, because our LED's were integrated into the fixture body itself, our products would fall into the "Directional" category because they were being defined as "inseparable SSL luminaires". We found this both misleading, and confusing as we could not understand why having an integrated (non removable) LED would change the categorization of the lighting product; removable, or non-removable does not impact directionality of the light. We would argue that regardless of whether the LED's were removable, or non-removable, the fixture categorization should be determined by the final intent, and use of the fixture. In the "Non-Directional" category, we feel that all the examples listed in the Final Draft are indeed "Non-Directional". As such, we would like to see the category "Solid State: LED Light Engine" as shown on Page 11 changed to say "Solid State" LED Light Engine, or Integrated LED Light Source" (i.e. inseparable), and eliminate the "inseparable SSL luminaires" classification altogether. We feel that this would more clearly put the burden of lighting type categorization on end fixture use, rather than the "removability" of the LED source.

Furthermore, we would also suggest that the 800 lumen in situ minimum light output from the LED's as shown on Page 11, Column 3, be modified to include additional exceptions. We would argue that, like the current exception for chandeliers, there are other Non-Directional light products that don't, and aren't lamped with the equivalent of a 60W incandescent bulb; notably, chandeliers, bath bars, decorative pendants, portable

desk lamps, wall sconces, and outdoor ceiling, pendant, and porch lights. In many cases, many of these luminaires are lamped with bulbs ranging from 25 watts to 40 watts of incandescent because 60 watts of incandescent light is simply too bright for the application. We would propose an expansion of the exceptions list to include these other types of lighting fixtures, and reduce the minimum lumen output to 300 lumens per head for chandeliers, and bath vanity having ≥ 3 heads; 200 lumens is the approximate light output of a clear candelabra 25W incandescent bulb. For all other types of “Non-Directional” fixtures mentioned above, we propose a minimum light level of 350 lumens, which is the approximate equivalent of a frosted 40 watt incandescent bulb. We believe this would be more in keeping with what people’s expectations for performance from these fixtures would be, and ultimately, it will be up to the consumer to decide which fixture brightness best suites their particular need.

Having been in the Energy Efficient lighting business since 1992, and having received the Lighting Partner of the Year award four times, we are truly and advocate of Energy Star, and want to see new technologies filter into the retail mainstream. That is why we are proposing the above changes in categorization, and adding some additional exceptions to minimum light output for specific residential lighting fixtures. We hope you will take these suggestions under careful consideration, and grant a favorable ruling.

Best regards,

Alexander Kowalenko