

Email received on June 22, 2010 from Jonathan Melman.

Dear Energy Star,

I am writing to provide feedback on the most recent draft version of the Energy Star requirements for lighting products and specifically solid state lighting.

1. There is a note in the draft which states that EPA is in favor of eliminating option 1 in favor of option 2 for lumen maintenance. This places solid state lighting at an arbitrary disadvantage, since fluorescent and HID systems are not required to be tested for the same lengthy duration, nor are they required to be tested at the full luminaire level as SSL option 2 dictates. Rather than enabling design of luminaires around a tested, established LED platform, the proposed action requires the SSL industry to endure 9 months of testing AFTER the luminaire design is finalized. Such a proposed action appears designed to KEEP the latest, and best technology off the market, rather than helping it get there. The current method of option 1 already requires analysis of the final luminaire as set for deployment and requires testing of the power supply operating temperature, so I'm not really sure what the basis is for the proposed dropping of option 1. If there are concerns that something important is being missed in the current option 1, then the Energy Star policy should define it and address it, rather than placing a roadblock which hinders innovation, and blocks small businesses from participating.

Best regards,

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