

Email received on January 14, 2011 from Greg Murphy.

Dear Alex,

Following are the MaxLite comments on this very import draft. I was going to state how important we feel about #2 below but I could never had said it as well as David Shiller has a short while ago.

Please do contact me if you have any questions,

Greg Murphy
MaxLite

1. We are most concerned about the new verification testing requirement of 10% of all models 3rd-party tested. This significant new cost is in addition to all of the new costs associated with the 3rd-party 'certification bodies.' We have had more than a couple OEM customers tell us that this will reduce the number of SKU's that they submit to E*, due to the increased costs.
2. "For luminaires incorporating replaceable ballasts, a written warranty shall be included with luminaire packaging at the time of shipment which covers repair or replacement of defective parts of the luminaire housing, mounting hardware, optics, ballast and trim for a minimum of three years from the date of purchase. GU24 based integrated lamps shipped with the luminaire shall carry a minimum 3 year warranty, based on usage of no less than 3 hours per day."
We think this is too far, as the fixture manufacturer is responsible to replace GU24 lamps that met the 10,000 average life requirement (10 hrs per day for 3 years exceeds 10,000 hours.). This will drive MaxLite and other OEM's back to PL lamps and the inherent field replacement issues with the accompanying ballast. This will render Energy Star rated fixtures disposable (again!).
3. MaxLite has also contributed to the ALA and NEMA responses.