

To: United States Environmental Protection Agency

Re: ENERGY STAR proposed changes to Luminaires Specification Version 1.1

Maxlite supports all of the changes proposed in the most recent letter (Nov. 30, 2012) regarding proposed changes in the ENERGY STAR Luminaires Specification Version 1.1. In particular, we strongly support the following:

- Leaving in place the current minimum efficacy requirement at 65 lumens per watt, and removing the Sept. 1, 2013 increase requirement.

As of this time, we feel that 65lpw is an acceptable performance level and will allow greater adoption of qualified luminaires. Further, we feel that September of 2013 is too soon to ratchet up this minimum performance value and doing so will limit the availability of qualified products.

- All of the added exceptions to allow lower wattages in a broader spectrum of decorative luminaires
Certainly not all decorative luminaires require 800lm min levels of light, and allowing a broader base of products such as wall sconces will lead to a greater participation in the program and eliminate unnecessarily high lumen products that are designed as such just to meet an 800lm minimum.

- All FCC Electromagnetic and Radio Frequency Interference requirements and references being removed from the specification
We support this revision.

Thank you for allowing us to comment on these proposals.

If there are any questions, please let me know.

Best Regards,

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