

January 14, 2011

Alex Baker  
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US EPA

Dear Mr. Baker, We appreciate the opportunity to comment on the ENERGY STAR Luminaires Specification V1.0 Final Draft.

We continue to have the following important concerns about the specifications:

The definition that continues to be used for LED LIGHT ENGINE on page 5 is not an LED LIGHT ENGINE as many luminaire manufactures are using today. Note that only a handful of products meet the letter of the current definition in this draft specification.

The definition EPA uses in this specification is a copy of the LED light engine definition from IES RP-16. However, the definition in RP-16 is actually the definition of an INTEGRATED LED LIGHT ENGINE. As most manufacturers use LED Light Engines today, they are actually a NON-INTEGRATED LED LIGHT ENGINE, a definition that is planned to be inserted into RP-16, but not yet inserted to the document at this point.

While Permlight makes LED light engines of both the integrated and non-integrated type, a very limited amount of light engine products actually meet the LED LIGHT ENGINE definition as currently defined in the Luminaires spec. In order to employ LEDs in the vast category of products classified as "non-directional" in the Luminaires spec, a manufacturer would need to employ an LED Light Engine that is an INTEGRATED assembly of LED module, heat sink, and driver. i.e., driver can NOT be remote mounted and away from the heat sink. Such a remote configuration is better thermally in many cases, and is much more widely available to be used.

Maintaining an approach that allows only integrated engines to be used as LED light engines under this specification will severely limit the products that are available to be used by manufacturers, as well as potentially limit the type of applications that can employ such products due to aesthetic, performance, and thermal issues. While I am not certain, I don't think it was the intent of EPA to limit the use of LED light engines to only the type that is considered "integrated."

We recommend that the word INTEGRATED be removed from the LED LIGHT ENGINE definition and/or the proposed RP-16 draft non-Integrated LED light engine definition be included in the spec, and allowance of such products be included in the document to meet the requirements of LED LIGHT ENGINES.

Thank you for allowing us to submit these comments, and we look forward to your consideration.

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