



U.S. Environmental Protection Agency
ENERGY STAR Program
Taylor Jantz-Sell
ENERGY STAR Lighting Program Manager
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Washington, DC 20460

**Philips Lumileds Lighting
Company**

370 West Trimble Road
San Jose, California 95131
USA

Subject: ENERGY STAR Program
Requirements Product Specification for Lamps
(Light Bulbs) Version 1.0 Draft 2

Date: August 23, 2012

Dear Ms. Jantz-Sell:

Philips Lumileds supports the ENERGY STAR program and views the Program as a critical tool for advancing consumer adoption of solid state lighting technology. In support of EPA's efforts to promote cost-effective high quality efficient lighting products, Philips Lumileds is pleased to enter these comments regarding elements of Draft 2 of the Lamps V1.0 specification pertaining to LED emitter-level performance.

As noted in our comments regarding Draft 1, the proposals to tighten performance requirements for initial color consistency and color maintenance are laudable but would have the unintended effect of increasing the cost of ENERGY STAR certified LED lamps. The proposed reduction of minimum solid state lifetime requirements from 25,000 to 10,000 hours, while also well intentioned, would result in initial color consistency and color maintenance degradation running counter to EPA's stated goals for these parameters. For these reasons Philips Lumileds is pleased to see these requirements reverted in Draft 2 to the values presently required by the Integral LED Lamps specification.

We do, however, note that the proposed passing test requirement for color consistency allows for no units outside of a 7-step ANSI quadrangle, whereas one unit was previously permitted. Lamp manufacturers typically require a higher level of performance at a component level in order to achieve the target system performance. This change may effectively increase the cost of certified LED lamps, as lamp manufacturers will need LED emitters providing a higher level of performance to meet the lamp-level requirement.

Regarding the color angular uniformity limit of $\Delta 0.004$ on the CIE 1976 (u'v') diagram, Philips Lumileds sees an inconsistency in proposing an increase from the present requirement ($\Delta 0.006$) while also questioning the reliability of existing infrastructure to evaluate compliance with the more stringent requirement. This system level performance should be a goal for the market as a whole as price and performance improves, not a minimum requirement.

Philips Lumileds looks forward to continued collaboration with EPA to further expand the value of the ENERGY STAR lighting program for consumers and businesses

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while also supporting the needs of the market. Please contact us any time we may be of assistance.

Best regards,

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