

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

May 13, 2011

Dear ENERGY STAR<sup>®</sup> Lighting Partner, Stakeholder or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) makes available proposed changes to the ENERGY STAR Integral LED Lamps specification. This Version 1.4 specification formalizes previously proposed enhancements to the non-standard lamp labeling requirements and incorporates a number of minor refinements associated with the institution of third-party certification. EPA expects to finalize and post Version 1.4 by June 1, 2011.

Last November, EPA proposed removing non-standard lamps from the ENERGY STAR Integral LED Lamp specification because of concerns that these products could undermine confidence in the ENERGY STAR label by failing to meet consumer expectations (i.e., by visually appearing to match an ANSI standard lamp shape but failing to meet the photometric performance requirements of that shape). In response to compelling feedback that the Agency maintain ENERGY STAR eligibility for these products, EPA subsequently decided to pursue enhanced labeling requirements for these products, to ensure consumers understand their intended use, the applications for which they are designed and their limitations. On January 19, 2011, EPA outlined a new labeling proposal for stakeholder comment and is now formally revising the ENERGY STAR Integral LED Lamp specification to adopt it.

The Agency will carefully monitor the response to these new labeling requirements and will refine them as appropriate as part of the ongoing ENERGY STAR Lamps V1.0 specification development.

In addition to the labeling requirements, this revision incorporates refinements to language that was inadvertently not completed in anticipation of ENERGY STAR's Third-Party Certification requirements, which went into effect on January 1, 2011. These changes include:

- Removal of the Laboratory Requirements column, outlining which facilities may be used to test lamps, from the tables in the specification. These requirements are now outlined in materials available at: [www.energystar.gov/3rdpartcert](http://www.energystar.gov/3rdpartcert)
- Removal of section 14, Independent ENERGY STAR Integral LED Lamp Third-Party Testing and Verification Program; going forward, verification testing will be conducted by EPA-recognized Certification Bodies.
- Removal of language in section 16 detailing requalification processes which are no longer managed by EPA contractors and are instead being managed by EPA-recognized Certification Bodies.

- Removal of references to NVLAP-accredited or CALiPER-recognized laboratories, since the new Third-Party Certification requirements now specify that testing be done in EPA-recognized Laboratories. A list of EPA-recognized Lighting Laboratories is available at [www.energystar.gov/lightinglabs](http://www.energystar.gov/lightinglabs). For more information on the Third-Party Certification requirements, please visit [www.energystar.gov/3rdpartycert](http://www.energystar.gov/3rdpartycert).
- Addition of testing guidance for the LED Operating Frequency requirement, aligned with language appearing in the ENERGY STAR Luminaires V1.0 specification.
- Revision of section 17 language detailing retirement / discontinuation of qualified products.
- Incorporation of technical clarifications issued by EPA on August 25, 2010. The technical clarifications regarding the CFL V4.0 Elevated Temperature test have been added to Appendix E. The clarifications regarding product variations, equivalency claims and Lighting Facts labels have been added to Appendix F.
- Referenced standards have been revised for clarity and/or updated to the latest version available.
- Reductions in testing requirements for minor product variations. See Appendix F.
- Addition of language to clarify that replacement lamps are based on the replacement of incandescent lamps with LED lamps.

Please note that products qualified under previous versions of the Integral LED Lamp specification are not affected by this revision.

Feel free to contact me at (202) 343-9272 or [baker.alex@epa.gov](mailto:baker.alex@epa.gov), or Ku'uipo Curry at ICF International at (202) 862-1559 or [kcurry@icfi.com](mailto:kcurry@icfi.com) if you have any comments or questions.

EPA looks forward to working with you to bring high quality, energy-efficient LED lamps to the market carrying the ENERGY STAR certification mark. Thank you for your continued support of ENERGY STAR.

Sincerely,



Alex Baker  
ENERGY STAR Lighting Program Manager  
U.S. Environmental Protection Agency