

Mr. Karney,

Our company is developing a series of LED outdoor products and would like them to have the Energy Star rating. Reviewing the draft proposal, we are in complete agreement that the entire system efficiency is the only way to compare products. Having a strong standard helps drive the development of products that are best for the customer. Our product release is focusing on outdoor, general lighting. I do not believe our products would fall under any of the category A: near-term niche applications. This means the final system efficiency would need to be 70 Lm/W at 70 CRI. We believe that our fixture is using the best available LED, driver and optical technologies to make the final system as efficient as possible; however, the most important factor is the starting efficacy of the LEDs. The best data we have from the leaders in the LED industry is that we are at 1-2 years away from LEDs that will produce a 70 Lm/W final system.

We are only a few months from releasing our products, so my suggestion is that you add another category A near term exception for general usage outdoor products. We would like an opportunity to share with you what we think is possible today, as we believe that there are many examples where currently available LED systems can compete favorably with all current outdoor lighting sources. Please call me so we can discuss this further.

Best Regards,
Kurt Wilcox
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