



As an Energy Star partner, TCP would like to submit the following comments regarding the proposed revision of the Energy Star Specification:

Removal of Early Labeling

TCP strongly opposes the removal of an early labeling alternative.

The proposed revision of the spec does not have a provision for early labeling products. Therefore, a manufacturer is required to have a product in testing for a minimum of one year, generally longer, before having the product listed. This forces new products and new technology to be sold into retail stores without being Energy Star listed.

TCP proposes the option to early label at 40% of life; and, in an effort to gauge rated life, keep the rapid cycle test. Under such a plan, the lead-time to have a bulb listed would roughly be:

Bulb Life	Full Test	40%
6,000	10 months	4 months
8,000	13 months	5.2 months
10,000	16 months	6.5 months

TCP feels this would be a fair compromise between the existing and proposed spec to allow early labeling to remain. Further, TCP feels that the failure to allow some form of early labeling will adversely affect the market as follows:

1. The retail market will be strictly a 6,000 hour market
2. New advances will be delayed getting to the retail market
3. New advances will be introduced without Energy Star
4. The retail market will lag behind other markets

Bi-Annual Unit Shipment Data

Although we believe the intention to follow market penetration is a worthwhile goal, as a private company, TCP will not release such data. DOE's intent to "argue that the data is exempt" is not a guarantee that the information will not be released.

TCP suggests Energy Star should set up programs with marketing research firms to measure POS data at the national retail outlets.

Retiring An Item

The requirement to “retire” a product number that has been de-listed is impractical. Most manufacturers include the wattage in the item number for identification. TCP would like to propose that there should be a designation on the Energy Star website that indicates that an item was retired or voluntarily de-listed or upgraded and replaced with a more advanced model. Further, for upgraded items, we would like to have the retired item linked to the upgraded item.

Because all items no longer listed are designated in red, no matter what the cause, it often sends an inaccurate and negative message to retailers, utilities and consumers.

Warranty

TCP is not in favor of a mandatory 24-month warranty.

The DOE clearly states the Energy Star specs are primarily intended for residential applications. However, similar bulbs are used for the retail consumer market and for the commercial/industrial market. There are many instances in the market where the bulb applications are more than “4 hours usage per day”. In many cases, these lamps burn continuously. That can be 8700 hours/year. Therefore, a mandatory 2-year warranty is not a viable option.

Labeling & Logo Size Requirements

The minimum size requirements in the new logo use guidelines may not work on all packages. As products and packages get smaller, space becomes limited. It becomes difficult to put the Energy Star logo in as large as requested. There will have to be some exceptions to these rules based on proportion and available space.

TCP is aware that Energy Star is primarily a residential program. The spec does not, however, take into account the large percentage of business that is done in the Commercial and Industrial market. On many occasions, product is shipped directly to a job site in bulk packaging for immediate installation. This packaging is not intended for resale. Therefore, threatening to de-list a product shipped in a plain white box that is not sold at retail is not only unreasonable, but also out of the jurisdiction of the Energy Star program.

Colored Bulb Category

We are in favor of adding colored lamps to the spec, but do not feel there should be a CRI or a CCT requirement. We would like to have further discussions on this topic.

General Comments

TCP would like to see:

- A. Equivalency specs for reflector and covered bulbs
- B. A recessed can application spec.
- C. The efficacy specs upgraded. Current specs are 3 years old