

**Westinghouse Lighting Corporation**  
**Paul Rorer, CFL Product Manager**

After review of the new Energy Star Requirements I feel that there are a few issues.

**The first issue is CRI for colored lamps.**

Any lamp designed to create an exclusive color would not be able to meet a CRI of 77 or higher. When you consider that a standard cool white is at 62 CRI I doubt that a "Bug Light" would be able to meet anything close to that. I propose that no CRI be specified for specialty colored CFL's.

**The second issue is one of lamp specification.**

As you may recall, I suggested an Energy Star + rating for products that exceed minimum criteria specifically which would be High Power Factor, Low Harmonic models where inrush and CCF are being addressed.

I understand your stance that Energy Star doesn't want to start having levels but I also that some recognition or differentiation should be placed on products that have more than the "Basic" advantages for the end user and utilities.