



September 4<sup>th</sup>, 2015

Dear Peter and Taylor,

We at Lumileds appreciate the opportunity to comment on Draft 3 of the ENERGY STAR<sup>®</sup> Lamps V2.0 specification, and we recognize the detailed work and dedication to American consumers evident both within the document, and throughout the specification revision process. Our thanks to you, and to the rest of the team.

We applaud EPA's decision to incorporate the new nominal correlated color temperatures of 2200 and 2500 Kelvin by normative reference to the recently revised ANSI standard C78.377-2015. These new ANSI CCTs present a new opportunity to promote energy efficient lighting among consumers and end users, particularly those who favor the warmer color temperatures normally associated with dimmed incandescent lamps. Standard and halogen incandescent lamps, when operated on dimmers, achieve some of the lowest luminous efficacy values available in the market. We're confident that inclusion of these new LED CCTs into the ENERGY STAR specification will help to drive adoption of far more efficient options in residential applications, and in commercial settings such as hospitality and retail, where warmer color temperatures are often employed.

In recognition of EPA's stated desire to more closely harmonize the Lamps V2.0 and Luminaires V2.0 specifications, we believe EPA may want to consider adding the new CCTs to the Luminaires specification as well, perhaps in a V2.1 revision.

The second version of the ENERGY STAR Lamps specification is an exciting next step in the evolution of EPA's longstanding efforts to promote energy efficient lighting. We look forward to working with EPA and ENERGY STAR partners to bring V2.0 certified products to market.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Baker", written in a cursive style.

**Alex Baker**  
Director of Standards & Regulations