

MaxLite Comments on ENERGY STAR® LAMPS Specification Version 2.0

Re:	Version 2.0 Draft FINAL ENERGY STAR Lamps Specification	<i>comment date</i>	12/18/2015
Section	Description	ML Comments	Suggestions
9.1	Luminous Efficacy	There will be a significant impact to our CFL business with this proposal for increased efficacy as this will mean limited sales for certified CFL lamps after January 2017. However, as long as EPA allows an adequate transition period for certified CFLs to ramp down production and sell through the market, we can support this efficacy increase.	Increase efficacy levels as proposed. Work with stakeholders to develop an adequate production ramp down and sell-through time frame and process.
9.5	Luminous Intensity Distribution	<p>We feel that EPA is making a huge mistake not to allow a path to certification for a new category of LED lamps that is likely to have a major impact in the industry in the coming years. This is the very warm CCT (2200K, 2500K) LED filament lamps that are designed to very closely replicate the popular incandescent filament lamps. These LED filament lamps typically have straight filaments and emit a very warm glow such that they are visibly identical to an incandescent filament lamp.</p> <p>By not allowing 2200K and 2500K CCTs, and maintaining an omnidirectional beam requirement for “A” and “T” ANSI envelope shapes, EPA is not allowing what customers are finding to be the most appealing types of LED filament lamps to be certified.</p> <p>Moreover, the filament LED lamps should be strongly supported by EPA as they are more efficacious than standard LED omni lamps. Efficacy levels are already looking to reach 140 lpw within the next several months.</p> <p>Currently, there are significant investments being made that will bring large quantities of LED filament lamps to the USA market, and costs will be coming down quickly. Given the choice, consumers will likely opt for filament style LED lamps in many cases versus traditional frosted omni lamp styles.</p> <p>Regarding beam patterns for the most popular styles of LED filament lamps (the ones designed with a filament to mimic the most popular incandescent filament lamps), we found it is not feasible to comply with omnidirectional luminous intensity requirements of this draft specification. We have provided EPA with data showing the tested output. As such, we suggest ALL LED filament lamps regardless of ANSI envelope shape be required only to meet the "Decorative" luminous intensity distribution requirements.</p> <p>It was noted by EPA in response to Draft 3.0 comments that since there are already certified filament style LED lamps, there is no need for a beam restriction. Yes, there are some certified filament LED lamps, but the lamps that are certified have filament shapes that are angled and NOT designed to mimic the popular incandescent filament configurations.</p>	Include a note in this section or in section 1.1 that ALL LED Filament lamps only need to meet the decorative luminous intensity requirements, regardless of ANSI envelope shape.

9.5	Correlated Color Temperature	<p>In reference to LED filament lamps discussed above, most customers prefer the warmer CCTs such as 2200K and 2500K in these lamp types as they most closely resemble the incandescent filament lamps.</p> <p>Although the EPA response to Draft 3.0 comments indicated that there was insufficient stakeholder input on the market demand for such CCTs, we feel that this low input is likely a result of the LED filament category of products being so new to the market.</p> <p>Also, EPA commented that there was not enough input regarding marketing terminology for the 2200K and 2500K CCT. We feel that marketing terminology for such CCTs should not be a deciding factor regarding whether these CCTs are allowed in the specification.</p>	Include 2200K and 2500K as allowable CCTs
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