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via e-mail: lamps@energystar.gov

May 17, 2013

Ms. Taylor Jantz-Sell
Environmental Protection Agency
ENERGY STAR Lighting Program Manager
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Comments from Lucidity Lights, Inc. on Draft 4 of the Lamps v1.0 Specification

Dear Ms. Jantz-Sell:

Lucidity Lights, Inc. appreciates the opportunity to comment on draft 4 of the ENERGY STAR Lamps v1.0 specification. While the bulk of our comments were submitted through NEMA, there are a few additional points that we would like to emphasize.

Section 2.0 – Effective Date

In the notes box for Section 2, we see that Energy Star is proposing a 12 month transition period from the existing to the new specification. We support the NEMA comment that a longer transition period is needed. In addition, we recommend that initial qualification to the existing v4.3 and v1.4 specifications be continued for a period of 12 months after the new specification is published instead of the 9 months proposed in the draft. This will allow products in the development pipeline to be tested and qualified. This is not a request to grandfather product. We understand that products would have to be retested to the final v1.0 specification.

Section 4.0 - Definitions

Compact Fluorescent Lamp

The Lamps v1.0 draft introduced a new definition for compact fluorescent lamp. As indicated in the draft specification the definition was taken from IES RP-16-10. It is also very similar to the definition of CFL that was introduced with the new Luminaires specification. We fully appreciate the intent to standardize/harmonize definitions between documents. Because it calls out specific lamp construction features such as tube diameter and bridging, for example, the new definition is narrower, and thus more restrictive, than the definition of CFL which appears in 10 CFR 430.2, and in the existing v4.3 CFL specification.

The definition of CFL which appears in the Luminaires specification is appropriate for that document as it is restricted to pin-based CFLs which are the type of lamp described in the definition.

IES RP-16-10 has a separate definition for self-ballasted lamp which was broadly written to accommodate both CFLs and other products such as self-ballasted mercury lamps. As such, it would not be an appropriate definition to use in the Energy Star draft.

As an alternative to what appears in the Lamps v1.0 draft, we offer the following definition which has been adopted from 10 CFR 430.2 and is as broad as the definition in the existing v4.3 CFL specification:

> Compact Fluorescent Lamp (CFL):
>
> An integrally ballasted fluorescent lamp with an ANSI standard base, a rated input voltage range of 115 to 130 volts and which is designed as a direct replacement for a general service incandescent lamp. The definition includes reflector and 3-way lamps (adapted from 10 CFR 430.2).

For your convenience, the definitions from the various documents cited above appear in an addendum to this letter.

Section 11.3 – Operating Frequency

For CFLs, keep the existing limit of ≥ 40 kHz. All screwbase CFLs have been designed to meet this requirement.

As indicated in the notes section of the draft #3 specification, the supplemental testing guidance was pulled from the SSL v1.4 specification. As such, it will not provide an accurate measurement of CFL operating frequency. This is not a critical parameter and we recommend that CFL manufacturers be allowed to declare the operating frequency until a suitable test procedure is developed.

Please contact me if there are any questions on our comments.

Regards,

Anthony Serres
Lucidity Lights, Inc.

ADDENDUM

Definitions of CFLs from various documents/regulations:

Energy Star

CFL Specification v4.3
Medium (Edison) Screw Base Compact Fluorescent Lamp:
A self-ballasted compact fluorescent lamp unit, with an Edison screw base, usually identified with the prefix E-26 as referenced in the American National Standard for Electric Lamp Bases, ANSI/IEC C81.61-2003.

Luminaire Specification v1.2
Compact Fluorescent Lamp (CFL):
A fluorescent lamp with a small diameter glass tube (T5 or less) that is folded, bent, or bridged to create a long discharge path in a small volume. The lamp design generally includes an amalgam and a cold chamber, or a cold spot to control the mercury vapor pressure and light output. (IES RP-16-10)

Lamps Specification v1.0, draft #3
Compact Fluorescent Lamp (CFL):
A fluorescent lamp with a small diameter glass tube (T5 or less) that is folded, bent, or bridged to create a long discharge path in a small volume. The lamp design generally includes an amalgam and a cold chamber, or a cold spot to control the mercury vapor pressure and light output (ANSI/IES RP-16-10). For purposes of this specification, compact fluorescent lamps include integral electronic ballasts and are equipped with an ANSI standard base.

10 CFR 430

Medium base compact fluorescent lamp means an integrally ballasted fluorescent lamp with a medium screw base, a rated input voltage range of 115 to 130 volts and which is designed as a direct replacement for a general service incandescent lamp; however, the term does not include—

(1) Any lamp that is—
- (i) Specifically designed to be used for special purpose applications; and
- (ii) Unlikely to be used in general purpose applications, such as the applications described in the definition of "General Service Incandescent Lamp" in this section; or

(2) Any lamp not described in the definition of "General Service Incandescent Lamp" in this section that is excluded by the Secretary, by rule, because the lamp is—
- (i) Designed for special applications; and
- (ii) Unlikely to be used in general purpose applications.