12/9/2011

Dear Mr. Baker,

On behalf of MaxLite please consider the following comments prepared for the first draft of the Lamps specification.

Scope of Specification

We encourage the EPA to consider including the following product categories in the lamps specification:

- Low voltage MR16 LED lamps – Regardless of the power supply used a low voltage LED lamp will significantly reduce the lighting system's power consumption. We believe that the specification should identify a reference test scenario (a specific low voltage track system for example) used to generate performance data for qualification and verification purposes.

  In response to the notion that an MR16 lamp cannot accommodate all required markings we note that the exterior of the reflector can be printed upon.

- Line voltage LED GU10 MR16 lamps - We anticipate aggressive growth in this category and don't agree that lack of an ANSI standard shape should preclude it from qualification. While this lamp shape has not been formalized we believe there is an immediate demand for Energy Star qualified 120v GU10 MR16 lamps. The specification can note it will be revised to include ANSI specifications once finalized.

  Would a line voltage GU10 MR16 lamp qualify as a non-standard product?

Correlated Color Temperature/Color Maintenance/Color Angular Uniformity

We would like to review feedback from LED chip manufacturers regarding the impact of restricting color variances within 4 steps of the MacAdam Ellipse. We are concerned that tighter color requirements will make drive up cost and reduce available supply of LED chips in popular color temperatures.

Lifetime Requirement

We seek clarification whether a manufacturer will have the option to initially qualify a product at the lowest lifetime claim (10,000 hours) with the intention of revising the lifetime claim. This will reduce the amount of testing time required before bringing a product to the market place.

Packaging Content

We are disheartened by the prospect of including a supplemental color temperature gradient to the graphic currently required by the FTC. We feel use of one CCT tool will minimize customer confusion and reduce clutter in product packaging.

12/9/2011

Power Factor

We do not believe this requirement should be harmonized between fluorescent and LED platforms. There are significant design changes that will be required to increase the power factor of CFL ballasts from .5 to .7. We are concerned that an increase in power factor from .5 to .7 will deter market adoption of energy efficient light sources. Manufacturing costs will increase (on average) by %50 for CFL products. This increase will not be easily absorbed by end users.

The increase in power factor will also increase heat generated by ballasts. An increase in ballast heat has two obvious implications:

- Shortened lifetimes
- Increase in early mortality caused by misapplications

We advocate using separate power factor levels for these technologies until there is a pragmatic way to enhance fluorescent ballasts.

Thank you for your consideration.

Ken Charton