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Comments on the ENERGY STAR Specification for CFLs Revision Draft (12/12/02)

1. Packaging requirements

The requirement for products to be delivered in approved packaging is not always desirable to customers. Some customers such as hotels and building project prefer to have products delivered in bulk packaging to minimize waste generation.

I think this requirement should be targeted to the proper type of purchasing. At retail and utility purchasing this requirement would fit perfectly. But when customers such as hotels, OEM, and building projects are purchasing, bulk packaging is more appropriate. Bulk packaging allows them to install the CFLs faster with less waste.

2. Color Temperature

Warm White fluorescent lamps are intended to simulate the color of incandescent lamps. As the Energy Star CFL specifications stand, 2700K to 3000K, the color is allowed to be a bit too white (3000K). I think a color range of 2600K to 2900 would be closer to simulating the color of incandescent bulbs.

3.1000 hour lumen maintenance

Why are we keeping the 1000 hour lumen maintenance requirement? I thought this was only supposed to be used as a guide or indicator of the performance for CFLs that were going to be early labeled. Now that the early labeling option will be taken off, I think this requirement is no longer necessary. Keeping this requirement only adds to the cost of testing.