

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

October 21, 2011

Dear ENERGY STAR® Lighting Stakeholders:

With this letter, the U.S. Environmental Protection Agency (EPA) is distributing Draft 1 of the ENERGY STAR Lamps V1.0 specification for partner and stakeholder review and comment. This new specification is intended to replace the existing Compact Fluorescent Lamps and Integral LED Lamps specifications, as well as the qualification requirements for GU24-based fluorescent lamps previously detailed in the Residential Light Fixture specification. The first draft was developed with consideration of comments received in response to the Lamps Specification Framework released on March 22, 2011. The Agency looks forward to a collaborative process to develop this technology-neutral lighting specification.

### **Background**

In December 2009, EPA laid out a plan to integrate the Program's four existing lighting specifications into two, new, technology-neutral specifications: Luminaires (light fixtures) and Lamps (light bulbs). This was undertaken to better serve the consumer interest in identifying energy saving lighting products by ensuring that performance requirements and testing methods reward efficiency and quality, irrespective of technology. In doing so, EPA also seeks to remove any overlap or contradiction among specifications, to eliminate confusion among stakeholders.

The Lamps Specification Framework issued in March was the first step in the process to develop the Lamps V1.0 specification. The Framework document provided a reassessment of the present ENERGY STAR lamp programs, and some initial thoughts about scope, definitions, performance requirements and test methods for the new specification. In addition, the Framework document solicited input from stakeholders through a series of questions designed to facilitate discussion, and to further EPA's understanding of the product category. Comments received, posted at [www.energystar.gov/lamps](http://www.energystar.gov/lamps), focused the Agency's attention on further improvements to quality-related requirements rather than increases to the already high efficiency requirements.

### **Proposed Performance Requirements**

EPA's intent is to merge the existing specifications into one technology-neutral specification while taking the opportunity to further increase the quality and reliability of lamps carrying the ENERGY STAR. The draft proposes only minor increases in efficacy. Analyses show that the proposed levels continue to reflect significant savings as compared to standard incandescent lamps, and are already being achieved by the majority of qualified models. The Agency acknowledges that a reexamination of the specification's efficacy levels will be warranted after completion of the phase-in of new minimum federal efficiency standards for general service incandescent lamps, as outlined in the Energy Independence and Security Act of 2007 (EISA).

During the development process, the Agency focused its attention on addressing remaining consumer barriers to the adoption of energy efficient lighting by developing proposed improvements to lamp start

time, run-up time, color consistency, and reliability in high heat and frequent switching applications. EPA also reevaluated the lamp labeling and packaging requirements in the existing specifications, and has proposed several changes to better enable consumers to select the right light bulb for their needs.

The first draft also includes a proposal to align lamp life requirements across technologies. Specifically, the draft includes a proposal for a 10,000 hour minimum lifetime requirement (10,000 hour rated lumen maintenance life for LED lamps). Qualifying product data shows this requirement to be readily attainable with compact fluorescent lamps. While the Integral LED Lamps specification has required a 15,000 to 25,000 hour minimum, there are disadvantages to this approach which appear to be hindering adoption of LED lamps. The technology-neutral 10,000 hour proposal is intended to simplify consumer purchasing decisions, and create an even playing field for the technologies employed to earn the ENERGY STAR.

Stakeholders are encouraged to carefully review the note boxes located throughout the specification, which provide details on the analyses and considerations made when developing the proposed levels.

### **Specification Development Process**

EPA will hold an all-day round table discussion in Washington, D.C. on Wednesday, November 30, 2011. The day will begin with an overview presentation of the draft specification, providing further details regarding how the proposed performance levels and testing requirements were selected. Please note that the meeting facility has a capacity limit of 80 attendees; therefore stakeholders will be limited to one in-person attendee per company. For those unable to attend in person, the presentation will also be available by live webinar. An agenda will be forthcoming under separate cover. Advanced registration is required for in-person and webinar attendance by sending an email to [lamps@energystar.gov](mailto:lamps@energystar.gov) providing attendee name(s), company, phone number(s) and email address(es). For those unable to attend in person or remotely, the overview presentation will be recorded and posted to [www.energystar.gov/lamps](http://www.energystar.gov/lamps) for later review.

As always, the exchange of ideas and information among EPA, ENERGY STAR partners and stakeholders is critical to the success of the Program. Partners and stakeholders are encouraged to submit comments on draft 1 to [lamps@energystar.gov](mailto:lamps@energystar.gov) by Friday, December 9, 2011. Please note that comments received will be posted to [www.energystar.gov/lamps](http://www.energystar.gov/lamps) unless marked "Do Not Post". Comments received will help to inform subsequent drafts. EPA anticipates finalizing the Lamps V1.0 specification in the spring.

Please feel free to contact me with questions or concerns at (202) 343-9272 or [baker.alex@epa.gov](mailto:baker.alex@epa.gov), and as always, thank you for your support of ENERGY STAR.

Sincerely,



Alex Baker  
ENERGY STAR Lighting Program Manager  
U.S. Environmental Protection Agency