



GE Lighting

1975 Noble Road
East Cleveland, OH 44112
USA

Via e-mail: lighting@energystar.gov.

April 2, 2015

Ms. Taylor Jantz-Sell
Environmental Protection Agency
Energy Star Lighting Program Manager
1200 Penn, Ave NW 6202J
Washington, DC 20460

Re: **GE Lighting Comments on ENERGY STAR® Luminaires Specification v2.0 Draft 2**

Dear Ms. Jantz-Sell,

GE Lighting appreciates the opportunity to provide comments on draft 2 of Luminaires specification v2.0. This comment parallels a similar comment made on the LAMPS 2.0 specification with regard to color naming. If suggested color names are maintained in both specifications, they should be consistent.

Clause 16.1 – Labeling & Packaging: All Luminaires

The color proposal to describe 2700 K, 3000K and 5000K is unacceptable as the terms Soft White, Warm White and Daylight are not consistent with the traditional industry use of these terms and if implemented would cause significant market confusion. 2700K has traditionally been used for the term “Soft White”, a term also commonly used with incandescent sources that operate at 2700K. “Warm White” has traditionally been used to describe “3000K” linear fluorescent sources. “Daylight” has traditionally been used to describe “6500K” linear fluorescent sources. The terms Soft White, Warm White and Daylight have been used to describe these color temperatures in the lighting industry for over 50 years. The only names that fit traditional industry descriptions are “Cool White” for 4100K linear fluorescent sources and “White” for 3500K linear fluorescent sources. Manufacturers have used many different names to describe 5000K sources.

Following is the comment made on the same topic area for LAMPS 2.0.

Note Box 29 – Consistent CCT Description

GE Supports the NEMA position to not include a mandatory requirement for Color names.

If EPA were to require a consistent CCT description, it needs to be consistent with color names used by industry for many decades. Using names that are not consistent will only increase consumer confusion.

Industry has consistently used the color names of Soft White, Warm White, White, Cool White and Daylight as far back as the 1950s.

Soft White was first used with incandescent lamps. As nearly all standard incandescent lamps operate near 2700K, consumers associate the name of Soft White with the warm color appearance of incandescent. When CFL and then LED products were developed to replace incandescent lamps, most manufacturers used the same Soft White term to convey an incandescent color appearance of 2700K and remove consumer confusion.

In the commercial linear fluorescent market, manufacturers have also used consistent color names for many years. The term Warm White is currently used for 3000K sources, the term White is used for 3500K sources, the term Cool White is used for 4100K sources. The term Daylight is used for 6500K sources. There are many different names, such as Sign White, Chroma 50, Design 50, or Colortone 50, but no consistent name for 5000K sources.

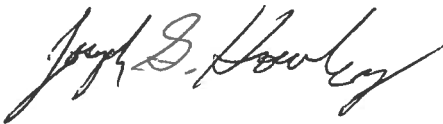
As the industry continues to use Soft White for incandescent or Halogen sources, and most manufacturers use it to describe their 2700K CFL and LED sources, it would cause great consumer confusion if only ENERGY STAR products used Soft White for 3000K. Likewise, as Warm White is still used by industry to describe 3000K sources, it would cause great confusion to change this term only for ENERGY STAR products. Finally the simple term White is used for 3500K and Daylight is used for 6500K. This color name use is consistent with decades of industry use.

There is no standardized industry name for 5000K or other color temperatures not mentioned above. EPA should not mandate color names, especially where there is no consistent color name. EPA should also not mandate a color name that is inconsistent with industry conventions, such as using Warm White to describe 2700K lamps. At best, EPA should simply provide a recommendation to use color names consistent with traditional industry practice when a common name exists.

Thank you for allowing GE the opportunity to provide comments on the ENERGY STAR® Luminaires Specification v2.0 Draft 2.

Please let me know if you would like to have a follow-up discussion to answer any questions pertaining to our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph B. Howley". The signature is fluid and cursive, with the first name "Joseph" and last name "Howley" being the most prominent parts.

Joseph Howley
Manager – Industry Relations
GE Lighting
NELA PARK
E. Cleveland, OH 44112
(216) 266-9729

joseph.howley@ge.com