

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



OFFICE OF  
AIR AND RADIATION

July 9, 2008

Dear ENERGY STAR® Partner or Other Interested Party:

On June 2, 2008, the Environmental Protection Agency (EPA) distributed Version 4.2 of the ENERGY STAR specification for Residential Light Fixtures (RLF), outlining the basis under which general illumination residential light fixtures employing LEDs could qualify for the ENERGY STAR label. This step was undertaken through a technical amendment because the existing specification (i.e. the key performance criteria) was not being changed. The amendment was offered to remove a competitive disadvantage for these general illumination or decorative light fixtures that was particularly apparent upon the availability of the new testing procedure referenced in the amended specification. Without this technical amendment, these types of fixtures would not be eligible for the ENERGY STAR Program, although light fixtures based on several other technologies are. Amendments to the ceiling fan and vent fan specifications were subsequently distributed, as changes to the light kit requirements in these specifications traditionally follow new developments in the RLF Program.

Since the release of RLF Version 4.2, EPA has received a number of comments and questions related to whether and how the specification will ensure only high quality LED products will qualify for the ENERGY STAR. With this letter, EPA would like to summarize the steps it has taken to address important quality issues and to provide stakeholders an opportunity to comment on the requirements.

EPA is consistently concerned with product quality and the potential impacts of poor quality products on the ongoing integrity of the ENERGY STAR Program and, in this case, the potential negative impact that quality issues could have on LED lighting. EPA believes that the technical amendment, extending existing performance requirements to a new technology, requires reasonable testing and other procedures to address the quality issues that are important to today's consumers such as light output, light color, and lumen maintenance/life. The ENERGY STAR specification requires testing data on light output and color temperature to substantiate manufacturer claims. The specification also references the ASSIST Recommends test procedure for lumen maintenance/life. This test accounts for heat-related performance issues and allows for an L<sub>70</sub> lumen maintenance projection using a 6,000 hour test. This is currently the most comprehensive test available as we wait to see developments with IESNA LM-80.

To address concerns about quality issues, EPA is offering the opportunity for interested parties to comment on the technical amendment of the RLF specification. To this end, EPA will be accepting written comment until August 25, 2008. Please send comments to [RLF@icfi.com](mailto:RLF@icfi.com). After this period, EPA will compile any comments received and consider the appropriateness and timing of any suggested changes.

A copy of Version 4.2, which includes web links to ASSIST test procedures, is posted on the ENERGY STAR website at:

[http://www.energystar.gov/ia/partners/prod\\_development/revisions/downloads/fixtures/RLF\\_V4\\_2\\_FINAL.pdf](http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/fixtures/RLF_V4_2_FINAL.pdf)

All stakeholder comments on the technical amendment will be posted on the ENERGY STAR website unless otherwise requested.

Thank you for taking the time to review this technical amendment; I look forward to working with you on this. Please feel free to contact me directly if you have any questions or concerns at (202) 343-9272 or via e-mail at [baker.alex@epa.gov](mailto:baker.alex@epa.gov).

Respectfully,

A handwritten signature in black ink, appearing to read 'Alex Baker', with a long horizontal flourish extending to the right.

Alex Baker  
ENERGY STAR Lighting Program Manager  
US EPA