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We have had an opportunity to review the 2nd draft of the CFL criteria and we would like to recommend 2 changes:

1. to part 1/ SCOPE - to include **candelabra based** lamps in this group. The majority of manufacturers who have product on the Energy Star web sight, make many of their lamps, using the same components, with a candelabra base. A visit to any lighting showroom through out the country would indicate that the candelabra sized base is very popular with residential lighting fixtures. My conversations with lighting showroom executives indicate that over 50% of the lighting fixtures in an average showroom require candelabra based lamps. CFL's have gotten smaller and more attractive in recent years, making the likelihood of their usage in open fixtures more possible. Including this base type within energy stars' umbrella would increase the availability of these lamp types and their potential usage in residential lighting fixtures.
2. "40% of rated life testing" - I would like the board to consider changing this requirement to **40% of rated life or 5,000 hours**, which ever comes first. We are beginning to see new lamps such as LED and Cold Cathode with rated life far exceeding 10,000 hours. If we continue to require these lamps to be tested to 40% of life - 40% of 25,000 hours (about 14 months) this will slow down development and therefore inclusion of these lamps in Utility rebate programs. I feel it should be our goal to encourage the development and introduction of new techniques not to length their testing requirements.