

Dear Richard:

As a fixture manufacturer, we have strong concerns over lamp quality under the DOE proposed spec. DOE's proposed 6,000 hours and lack of heat test would lead to lower quality products for fixture manufacturers, retailers, and consumers.

We have invested millions of dollars promoting the high standards set by EPA for fixtures and we feel any regression to the GU24 currently being deployed by fixture manufacturers will be damaging.

Further, DOE's proposed efficacy requirements for covered and reflector lamps will not meet California Title 24 efficacy requirements. This will bring E* fixtures out of harmonization with this important state building code. EPA has suggested that lamps qualified under DOE's proposed specification are insufficient to qualify an ENERGY STAR fixture. This nearly eliminates any market for the proposed DOE GU-24 lamps.

The new DOE proposal has generated and will continue to generate significant confusion in the pin based lamp market, and DOE may not meet its stated goals if EPA does not accept them for our ENERGY STAR fixture qualification (the only significant market they have). EPA already announced its labeling of GU-24 lamps two weeks prior to DOE's draft 3 spec release which we support.

For all of these reasons, and as a current ENERGY STAR fixture manufacturer affected by your proposal, Sea Gull Lighting strongly recommends removing GU-24 based lamps from the final DOE CFL specification V4.0.

Sincerely,

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