



9201 Washington Ave.
Racine, WI 53406-3772
Toll Free (800) 236-7000
FAX (262) 884-3309
Toll Free Fax (800) 236-7500

April 24, 2007

To: Richard Karney
From: Wayne Guillien (262-884-3236)
Subject: SSL Energy Star Program Draft 4/9/2007

Below are Ruud Lighting's comments and recommendations related to the most recent draft of the SSL Energy Star® Program. Please feel free to contact me if further clarification is required.

Page 5 Device Array Requirements

We strongly recommend increasing the lumen maintenance threshold from 35,000 hours to 50,000 hours. This increased threshold sets a very attainable standard that increases efficiency and product life through better luminaire thermal management. We feel strongly that the increased product life will significantly enhance the market acceptance by allowing the initial cost (as compared to current technology) to be amortized over a longer useful product life.

Page 12 Category B: Future Performance Targets

We support the 70 lm/w threshold performance standard, however we strongly object to the proposed three year waiting period to begin qualifying products in Category B. We are confident that the current technology is capable of meeting the performance standards for some of the major markets and commercial availability of these products is very near. We feel the Energy Star program will have an important impact on customer acceptance of SSL, however if the Category B SSL Energy Star program is shelved for three years the program will likely miss the market launch. This is a critical time, as the market will be developing its perception of the technology and ultimately determining the level of acceptance. The market would clearly benefit from Energy Star labeling at this critical period and frankly missing this period due to an arbitrary three year waiting period will jeopardize the technology and make the SSL Energy Star program irrelevant.

We recommend opening Category B as soon as the standards are complete and begin qualifying products as soon as possible, allowing technology to set the pace.

Page 17 Product Variance: Variations within Product Groupings

We recommend adding a category "Mounting" to the variations table with an "Allowed" marking. Many products have alternate mechanical mountings that have no affect on the thermal performance of the product.

Page 17 Paragraph 4 (LED allowed conditions)

The proposed allowed variation conditions for LED devices restrict changes in total flux. We object to this restriction as LED suppliers are continually improving the Lm/W performance and therefore the flux per package is increasing. As proposed, each transition to a higher flux bin would require retesting, despite the fact that the increased flux makes the product even more efficient.

We recommend allowing LED Flux bin increases without requiring retesting.