



**KYLE PITSOR**

Vice President, Government Relations

November 18, 2016

VIA EMAIL TO: [lighting@energystar.gov](mailto:lighting@energystar.gov)

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

**NEMA Comments on Draft ENERGY STAR® Program Requirements for the Use of LM-80 Data**

Dear Ms. Jantz-Sell,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide the attached comments on the subject proposal. These comments are submitted on behalf of NEMA Light Source Section companies.

As you may know, NEMA is the trade association of choice for the electrical manufacturing industry. Founded in 1926 and headquartered near Washington, D.C., NEMA represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the U.S. Domestic production exceeds \$117 billion per year.

Overall, the subject proposal appears straightforward. We are specifically concerned about the timing of ENERGY STAR's intent to transition to LM-80-2015 test procedures versus the previous LM-80-2008 version. We agree with using the most up-to-date reference available, but are concerned that thousands of products today have been tested to LM-80-2008 and retesting them would be costly and burdensome, especially given the rapid product obsolescence associated with today's evolving solid state lighting products. Some sort of phase-in period seems to be the intent of Note Box 2, but this is not clear. We request the EPA clarify this note box and consider allowing at least 24 months' time to transition to the 2015 version of LM-80. A minimum 24-month phase in period would allow for the incorporation of LM-80-2015 testing along with normal product development and obsolescence schedules.

Proposal: NEMA proposes EPA allow a minimum 24-month phase-in period from the date of publication of final guidance, during which LM-80-2008 data may continue to be used for submissions and LM-80-2015 data be encouraged as an option. Following the transition period, we support moving to LM-80-2015 as the sole reference.

Our member companies count on your careful consideration of these comments and look forward to an outcome that meets their expectations.

If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive style with a large, stylized "K" and "P".

Kyle Pitsor  
Vice President, Government Relations