

NEXT GENERATION LIGHTING INDUSTRY ALLIANCE

ALLIANCE MEMBERS

❖ 3M ❖ Acuity Brands Lighting ❖ Air Products and Chemicals, Inc. ❖ Applied Materials, Inc. ❖ CAO Group, Inc. ❖ Corning Inc.
❖ Cree Inc. ❖ Dow Corning ❖ Eastman Kodak Company ❖ GE Luminations, LLC ❖ Light Prescriptions Innovators, LLC ❖ LSI Industries
❖ OSRAM Sylvania, Inc. ❖ Philips Electronics North America Corporation ❖ Ruud Lighting, Inc. ❖ GLO-USA, Inc.

August 13, 2008

Dr. James Brodrick
SSL Program Manager
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Dr. Brodrick:

Thank you for your letter of July 25, 2008, providing the progress update. We are glad to see that DOE is moving forward on the SSL Quality Advocates Program and the life cycle study. If adopted universally, the SSL Quality Advocate Pledge, and subsequent product labeling, will allow manufacturers to provide systematic, unbiased consumer information on products, packaging, and literature. However, to remain unbiased the information presented in the product labeling must devolve from a common basis. We urge you to assure that industry-recognized standards and test procedures, such as LM-79 and LM-80, are the basis for such information. In addition, NEMA SSL Section has formed a Technical Committee, and one of the tasks for the committee is to develop SSL premium brand labeling. It will be beneficial to the SSL market if the NEMA SSL premium labeling program is collaborated with the DOE SSL QAP.

We believe the life cycle study is an important element in the comprehensive strategy that DOE has developed for solid-state lighting. While there is no question that LED general illumination lighting can play a huge role in the effort to reduce energy consumption and green house gas emissions, it is also important to understand the economic, social and infrastructure consequences of a broad market for this technology. It is our understanding that this study will only be successful if Dr. Matthews and his team are able to obtain suitable input and data. We are hopeful that NGLIA members will see the value of the study and agree to provide some of the required information. However, it must be understood that such information must be closely held and generic to avoid any anti-trust implications. This should be a point of discussion prior to the launching of any information gathering campaign.

With regard to the DOE ENERGY STAR Program, and the complications the entire industry faces because there now appears to be some confusion regarding the two SSL ENERGY STAR Programs, NGLIA remains a strong proponent of the DOE Program, as stated in the June 9, 2008, letter that was sent to DOE, EPA and the Council on Environmental Quality (CEQ). To date, we have not received a reply from our letter from either DOE or EPA; we have been in discussion with CEQ and met with Ms. Charlotte Skidmore on July 28. She

ALLIANCE ADMINISTRATION

NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION (NEMA)
1300 North 17th Street, Suite 1752, Rosslyn, VA 22209
❖ ph: 703-841-3274 ❖ fax: 703-841-3374 ❖ e-mail: kyl_pitsor@nema.org

Dr. James Brodrick
August 13, 2008
Page two

understands our concerns and committed to delve into the issue further in hopes of resolving the conflict. She agrees that two agencies defining standards for the same market will lead to confusion and potential disruption. Meanwhile we understand that DOE and EPA are attempting to resolve the issue of two criteria through normal inter-agency channels, we are concerned that this process will not be expeditious enough to alleviate market disruptions that are inevitable. Therefore, we urge your agency to move quickly to resolve its differences with EPA. However, we must ask that the conclusion not be a compromise that allows for two separate programs between which our member manufacturers must choose. Such a situation is unfair to the lighting industry and even more unfair to the consuming public.

Again our preference on ENERGY STAR is that the DOE Program be more inclusive for all the practical energy-saving and customer-pleasing products to be qualified, not only because of our past working relationship, but because we believe it is the right approach to assuring the success of the SSL commercialization.

Sincerely,


Kyle Pitsor