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Guidance Type: Conservation Standards, Definitions and Scope of Coverage, Certification

Category: Lighting Products

Product: General Service Fluorescent Lamps, Incandescent Reflector Lamps

Guidance Version: FINAL

Issued: January 30, 2014

Q: How does a manufacturer of general service fluorescent lamps or incandescent reflector lamps meet DOE's certification requirements if the manufacturer does not have sufficient data to submit a full certification report prior to distribution in commerce?

A: Manufacturers must submit certification reports for covered products and equipment prior to distribution in commerce, and annually thereafter. 10 CFR § 429.12(e)(2), (d). For new basic models, manufacturers generally submit a report that reflects completed testing of the product or equipment; however, for general service fluorescent lamps or incandescent reflector lamps, manufacturers may submit an initial certification report as described below.

An initial certification report must list the basic model number, lamp wattage, and date of first manufacture (i.e., production date) for that basic model. The certification report must also state how the manufacturer determined that the lamp meets or exceeds the energy conservation standards, including a description of any testing or analysis the manufacturer performed. An initial certification report must be supported by documented engineering analysis. DOE has created a separate template for initial certification reports to reflect the information required prior to testing being completed.

If the deadline for an annual certification report occurs during the first year of production and before the manufacturer has sufficient data for a particular basic model to file a complete certification, then the manufacturer does not need to include the basic model on its annual certification report. However, the manufacturer must file a complete certification report within one year of the first date of the model being manufactured and by each annual deadline thereafter. 10 CFR § 429.12(e)(2), (d).