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The requirements for High Efficacy Lighting do not seem to coincide with Energy Star Requirements. Specifically for Undercabinet Lighting, I would like to see an exception that states that Undercabinet lighting for kitchens that complies with Energy Star Requirements is considered high efficacy. This would encompass LED and Fluorescent sources. Without this exception, LED's fall short of the threshold. For this very specific category, there is a great opportunity to improve energy efficiency.

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Please feel free to call or Email me with any questions. My phone is 847-813-8053, and my Email is cwalsh@junoltg.com. Thank you for your consideration of these comments.

Best regards,

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