

January 24, 2025

**BY EMAIL**

FOIA Request Service Center  
US Department of Energy  
FOIA-Central@hq.doe.gov

**Re: FOIA Request – General Service Lamp Energy Efficiency**

Dear FOIA Request Service Center,

In 2005, Congress passed the Energy Policy Act. In this act, Congress listed the following objectives in Section 912(c): “The objectives of the Initiative shall be to develop advanced solid-state organic and inorganic lighting technologies based on white light emitting diodes that, compared to incandescent and fluorescent lighting technologies, are longer lasting, are more energy-efficient and cost-competitive, and have less environmental impact.”<sup>1</sup>

The Soft Lights Foundation contends that the US Department of Energy did not meet these objectives because Light Emitting Diode technology is not “energy-efficient” when compared to the incandescent light bulb, because solid state technology has more environmental impact, not less, and because LED light is hazardous to human health, including causing acute reactions such as seizures and migraines.

On March 21, 2023, the DOE issued a final denial of the Soft Lights Foundation petition to repeal the 45 lumen per watt rule for General Service Lamps.<sup>2</sup>

On May 30, 2023, the Soft Lights Foundation submitted a request to the DOE to comply with 21 U.S.C. 360ii and establish and maintain a liaison with the Food and Drug Administration to publish performance standards for Light Emitting Diode (“LED”) products.<sup>3</sup> The DOE did not respond.

On January 20, 2025, President Trump issued an Executive Order titled Unleashing American Energy, which states, “(f) to safeguard the American people’s freedom to choose from a variety of goods and appliances, including but not limited to lightbulbs, dishwashers,

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<sup>1</sup> <https://www.congress.gov/109/plaws/publ58/PLAW-109publ58.pdf>

<sup>2</sup> <https://www.regulations.gov/document/EERE-2023-BT-PET-0003-0003>

<sup>3</sup> <https://www.softlights.org/wp-content/uploads/2023/06/DOE-Petition-to-Collaborate-with-FDA.pdf>

washing machines, gas stoves, water heaters, toilets, and shower heads, and to promote market competition and innovation within the manufacturing and appliance industries”.

The Department of Energy’s decision to set a 45 lumen per watt minimum, and subsequent 120 lumen per watt minimum, for General Service Lamps without requiring those GSL’s to meet any quality, health, or safety standards, and without requiring LED GSLs to have the same spatial, spectral, and temporal properties as incandescent light bulbs, contradicts President Trump’s Unleashing American Energy Executive Order. Therefore, in preparation for an Administrative Procedure Act lawsuit against the DOE and in support of President Trump’s January 20, 2025, Executive Order, the Soft Lights Foundation hereby requests the following documents from 2005 through 2024 related to LED General Service Lamps under the Freedom of Information Act. In the list below, the term “documents” shall mean all documents, research, emails, agreements, memorandums of understanding, meeting minutes, justifications, and publications.

1. All documents related to the decision by the DOE to set the 45 lumen per watt minimum for GSLs.
2. All documents related to the decision by the DOE to set the 120 lumen per watt minimum for GSLs.
3. All documents involving the FDA and LED products, including documents related to the decision by the DOE to liaison or not liaison with the FDA on setting performance standards for LED products.
4. All documents related to the decision by the DOE to deny Soft Lights Foundation petition(s).
5. All documents related to the how the DOE defines the term “energy-efficiency”.
6. All documents related to the how the DOE defines the term “white light”.
7. All documents related to the how the DOE defines the spatial, spectral, and temporal quality metrics for incandescent light and LED light.
8. Provide a Vaugh Index for any documents that are not released.

These documents will create the administrative record for the APA lawsuit.

Sincerely,

/s/ Mark Baker

President

Soft Lights Foundation

[mbaker@softlights.org](mailto:mbaker@softlights.org)