

## Rogers, Daniel

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**From:** Steve Yang <SYang@soraa.com>  
**Sent:** Friday, September 04, 2015 5:12 PM  
**To:** lighting@energystar.gov  
**Subject:** Energy Star Lamps V2.0 Draft 3 Comments

Dear EPA,

Thank you for the opportunity to provide feedback/comments for Lamp V2.0 draft 3 specification. Below are the comments from Soraa Inc.

--Lamp Lumen Efficacy

The new spec requires the minimum Lm/W for directional lamps will change to 65Lm/W as of September 2016. **Does this mean that previous certified lamps with a low efficacy will lose Energy Star certification in a year's time?**

**What is the impact of the new spec on the lamps already passed Energy Star Certification?**

We would STRONGLY advocate that lumen efficacy based on a CRI dependent formula. For example:

80CRI lamp needs to pass 65Lm/W

95CRI lamp needs to pass 54Lm/W

-GU10 MR16 lamps

### **Section 1.1. Included products**

Current Lamp spec V1.0 only include GU10 base PAR16 lamps, and many GU10 LED lamps in the market are MR16 lamps. We recommend EPA to include GU10 base MR16 lamps in the list.

-“Trim” accessories should be allowed as a product variation

### **Section 7.1. Product Variations**

The first paragraph in this section mentioned that “product variations are allowed so long as variations will not negatively impact a lamp’s compliance with any performance criteria in this specification.”

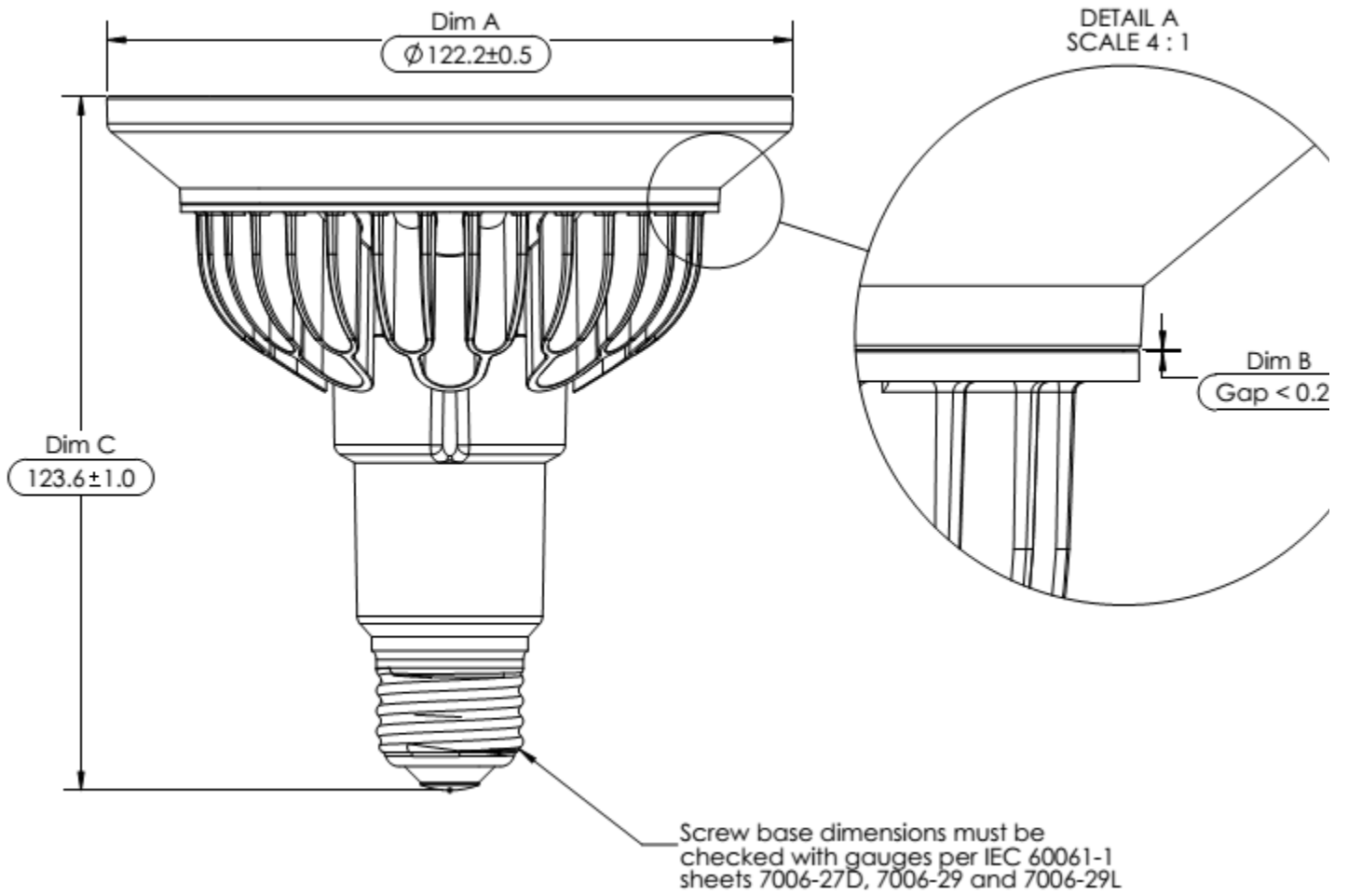
Table 2 listed limited variations allowed.

One of the variations we like to add to this list is “trim” accessories used for LED lamps. We designed a “trim” accessory for our PAR30L lamp and the trim is an accessory to the lamp. This has no impact with the performance of the lamp. Additional data can be collected to verify there are no negative thermal impact on the LC and other critical parts of the lamp.

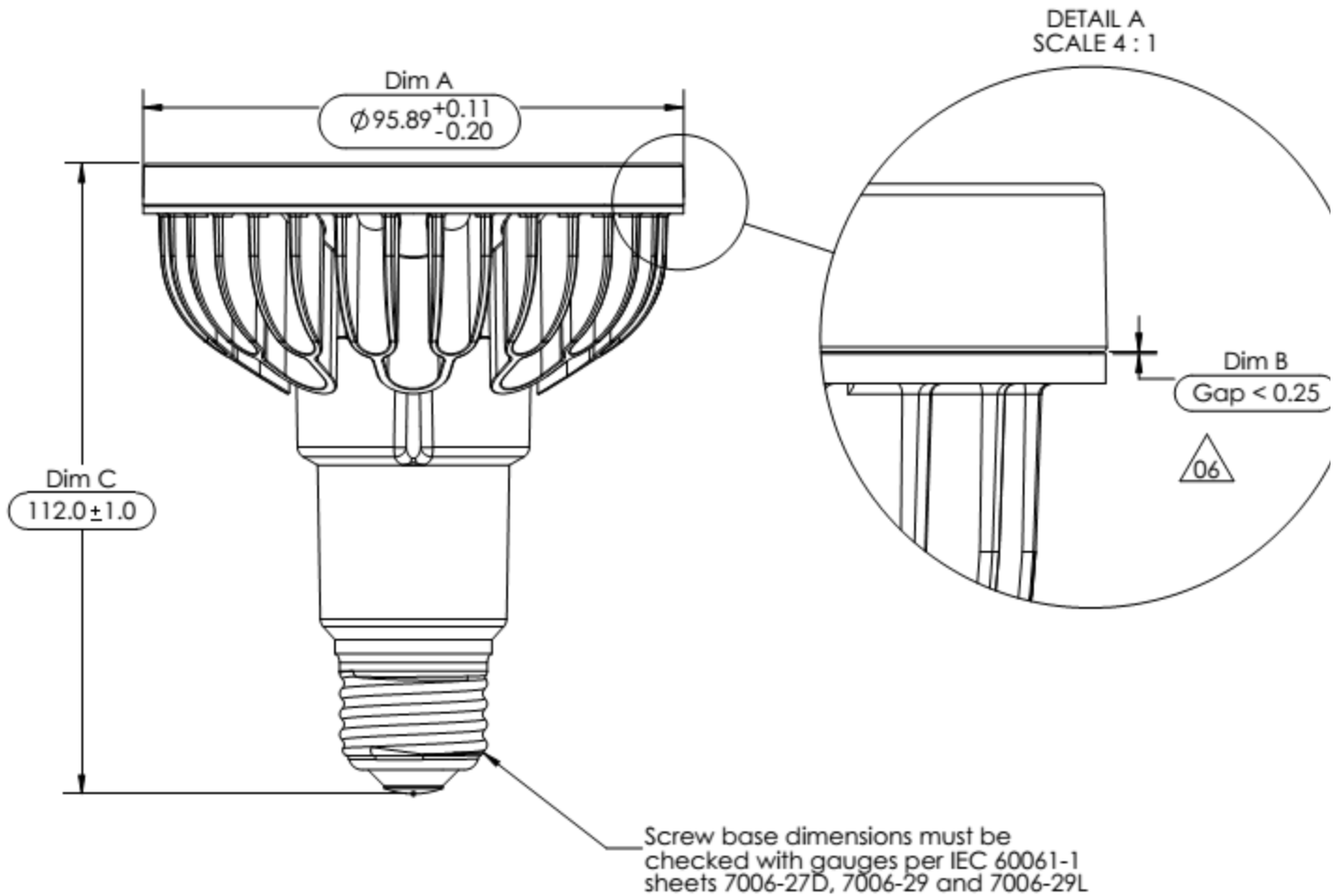
The only component change is with “a trim” or without one.

The lamp is built on the same platform as our PAR30L which is being tested and to be certified by Energy Star. Given this precedence, the PAR30L with a trim accessory should be accepted as the same family as PAR30.

PAR30L with a trim accessory:



PAR30L without trim:



-Lower power variation should be allowed (in Table 2)

**Section 7.1 (table 2 – Allowable Variations)**

In many cases. Manufacturer will design lamps with varies of power levels using the same construction and drivers. Our recommendation is lower power lamps should be included in the same family as the higher power lamps. If the base model tested is a higher power version, then the lower power model should be covered with limited testing (excluding 6000 hrs of lumen and color maintenance testing).

-All measurement should allow a tolerance

-e.g. Lumen efficacy, CRI measurement, R9 measurement, CCT measurement etc.

-Color maintenance

**Section 9.8. Color maintenance**

The limit of color shift is  $<0.007$ , however, the section does not specify the testing duration. The assumption is 6000 hrs, but can we make it clear?

-Audible Noise

**Section 12.5 Audible Noise**

the existing language is easily-misinterpreted English. "Lamp shall not emit noise above 24dBA at 1 meter or less."

We propose two changes:

First, the standard should apply to all lamps, both dimmable and non-dimmable lamps.

Second, the requirement should state: "Measured acoustic output from the lamp at a distance of 1 meter,

at any dimmer setting (if a dimmable lamp), shall be less than or equal to 24dBA.”

Thank you and looking forward to the feedback from EPA.

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