From: Joyce Shen 沈育庭
To: lamps@energystar.gov;
cc: JD Guo 郭政達; Mong Lin 林孟毅;
Subject: comments in response to ENERGY STAR Program Requirements for Product Specification for lamps (Light Bulbs) DRAFT 1
Date: Friday, December 09, 2011 1:28:15 AM

Dear Mr. Baker,

On behalf of Lextar Electronics Corp., we respectfully submits the following comments in response to the proposed ENERGY STAR Program Requirements for Product Specification for lamps (Light Bulbs), version 1.0, DRAFT 1, released on October 21, 2011.

1) Concerning Correlated Color Temperature Requirements, we suggest maintain the 7-step quadrangles for solid state lamps. Also, in the Color Maintenance Requirement and the Color Angular Uniformity Requirements, we suggest keep the chromaticity variation within the current 0.007 specification. We believe that we should set reasonable criteria in the initial market development stage of the SSL. Too strictly criteria will raise the cost of the SSL products. Nowadays, cost down is still an important issue for SSL to get into the market to compete with the mature compact fluorescent lamp.

2) Concerning Lamp Labeling Requirements, we think there are too many items to print on the small printable area of the lamp. We suggest that keep following information to be printed on the lamp and move some items to packaging.

- lamp manufacturer or brand name (keep)
- lamp model number (keep)
- lamp input power in watts including “watts” or “W” (keep)
- lamp rated lumen output including “lumens” or “lm” (keep)
- lamp nominal correlated color temperature including “Kelvin” or “K” (keep)
- “dimmable”, “non-dimmable”, “not dimmable”, “not for dimming” or the like (keep)
- lamp rated voltage (new added item)
- “Do not use in totally enclosed fixtures” or the like, as applicable (suggest move to packaging)
- “Do not use in recessed fixtures” or the like, as applicable (suggest move to packaging)
- “contains mercury” (for compact fluorescent lamps) (suggest move to packaging)
- electrical safety marking(suggest move to packaging)
- phone number for questions or complaint resolution (suggest move to packaging)

Thanks.

Sincerely,

Joyce Shen

Global Manufacturing Center

Lextar Electronics Corp.

No. 23, Li-Hsin Rd.

HsinChu Science Patk

Hsinchu 30078, Taiwan, R.O.C.

Tel: +886-3-5658899 Ext. 1788

joyce.shen@lextar.com

www.Lextar.com