**From:** Raghu Rao
**To:** lamps@energystar.gov; Boesenberg, Alex;
**cc:** Sandeep Sood;
**Subject:** ENERGY STAR Lamps V1.0 First Draft Comments
**Date:** Friday, December 02, 2011 2:11:07 PM

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We would like to bring the following concerns for your kind consideration :

**Testing for Various CCT :** As long as the lamp design is the same including the LED chip Model, only one model testing(Lowest CCT) should be sufficient for ES approval, for the other CCTs, ES approval should be given based on LM-79 testing . Individual testing for various CCTs of the same design lamp must be eliminated.

**Testing for Various Beam Angles (SP, FL, NFL, WFL) :** As long as the lamp design is the same including the LED chip Model, only one model testing should be sufficient for ES approval, for the other Beam angle lamps, ES approval should be given based on LM-79 testing . Individual testing for various Beam angles of the same design lamp must be eliminated.

**Lower Current Lamps :** As long as all the lamp design is the same including the LED chip, only Higher current lamp should be tested for ES approval, and the lower current models should be approved based on LM-79 testing.

**Higher Lumen Bins :** As the LED technology improve the Lumen levels, and if the lamp designs remains the same, then ES should upgrade the performance levels based on LM-79 data and the LM-80 data, instead of re-testing the lamps.

**6500 K CCT :** We strongly believe, that this is beyond the scope of EPA. Customer should have freedom of choice. The 6500K CCT must be retained, and should not be eliminated.

**CCT Tolerance :** We strongly believe that the CCT Tolerance should be left at 7 steps instead of modifying to 4 steps (Mac Adam), as it may add more cost to the lamp. It can be re-visited once the LED technology stabilizes.

**Run-up and Starting Time for CFL :** We strongly are against changing the existing standard. These products are already accepted in the market place, and should be left alone by not adding cost to the product, as well as testing cost burden to the manufacturers.

**Power Factor => 0.7:** The power factor of =>0.7 should be maintained. By

changing the requirement, it will add cost to the product and more testing cost and burden to manufacturer, particularly small manufacturers.

**Labeling :** There should be ONLY one law which covers the requirement of FTC, EPA, UL and various other requirement including the State laws, and frequent changes to the labeling law must be avoided.

The color chart may lead people to think as a "colored lamp". We recommend the CCT chart to be just black and white, and marking the actual CCT in the chart.

**Noise Requirement :** This is beyond the scope of EPA. We believe it should be left as it is.

**Testing Time & Cost :** When creating testing rule and regulation, (1) The speed of bringing the new product to the market with faster approval must be considered , so that the consumer can benefit from the new technology, and (2) The cost of testing and burden to the small manufacturers must be considered as well, particularly with present economy.

The regulations must benefit consumer, and should be manufacturer friendly. Too much regulations and revisions on requirement will add cost to the products which can affect the consumer. The added testing cost through many regulations and by changes in the requirement, will affect the Smaller Industries, and it eventually will weed-out all the small players in the game. We request to **eliminate un-necessary testing cost and burden to the small manufacturers**, and to keep it simple for the benefit of consumer as well as the small manufacturers with proper balance.

Thank you,

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