
From: Michael Chan [chan_michael@comcast.net]
Sent: Friday, April 23, 2010 5:22 PM
To: energystarverificationprogram@energystar.gov
Cc: Michael Chan
Subject: Energy Star Verification Program - Comments

Ms. Vokes,

We have attended your presentations and we are glad to compile to the proposed Energy Star Verification Program. Over here, we have a concern and we are hoping that ENERGY STAR will give this concern some considerations. As you are aware of LEDs are produced with same materials and manufacturing process, they have some variations in terms of color temperature and intensity. In addressing these color temperature and intensity variations, LED manufacturers and or Solid State Lighting manufacturers are tending to bin their products. At the end, it is consumers' benefit in getting the same color temperature and same intensity products to achieve uniformity throughout their lighting applications. This may be our ultimate goal in driving market adoption. The challenge that we are facing is the cost of qualification and verification. Based on the specification being written today, we may have to do multiple qualifications and verifications due to these variations. For example, our MR 16 has 4 variations due to color temperature and viewing angles. They are all make from the same LED, same electronics and same lens materials. From UL perspective, we could qualify this as a family of products. However, with ENERGY STAR, we have to qualify and to verify them as four individual products. Our cost of being ENERGY STAR listed may be quadrupled. Then, it is a heavy burden on us financially. At the end, we may need to pass along this cost to our customers. Solid State Lighting is on the expensive side for consumers' perspective. If we are adding more cost into the system, we may made our products more costly. This may be contradictory to get adoptions and to achieve energy conservations. Therefore, we are hoping that ENERGY STAR may consider this particular situation and this is very unique situation to (LED) Solid State Lighting.

We are looking forward to see some modifications.

Best regards,

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