I fully endorse the purpose and scope of the program.   I do think that the costs to certify are onerous for small LED companies, such as ours, and to have to wait over 9 months to get results is troublesome for products in an industry that has an almost 100% annual turnover of products.   As for verification I think it is a true burden and an abuse to require that suppliers endure the cost of verification since it will be random, expensive and arbitrary , and definitely not budgeted which can be crucial for small companies.   Possibly if the verification process turns up 'false' products then the supplier would be penalized, but if the verification supports the original certification there should be no penalty.

With the potential for thousands of different bulbs to be certified and verified this will be a boon to the testing labs but also a potential for a bottleneck for suppliers.   Thanks for opportunity to voice.   Regards

Frank Wysaski
Vice President Marketing
Light Emitting Designs
108 S. Wynstone Park Drive
Suite 103
North Barrington, IL 60010
847-380-3540
www.led-llc.com