



February 11, 2010

Mr. Alex Baker  
Lighting Program Manager, ENERGY STAR  
EPA

RE: Comments to Proposed Amendment changing the LED Operating Frequency

Dear Mr. Baker,

Cypress Semiconductor is pleased to provide input to the proposed amendment changing the LED Operating Frequency requirement from 150 Hz to 120 Hz. As a supplier of LED drivers to Integral LED Lamp manufacturers, we are often involved in the lamp development and debug. Through our experience with these manufacturers, we have had to become knowledgeable at the system-level in order to enable our customers to get into production. As such, we have seen the sensitivity that LED lamps have to flicker and the system-level provisions required to eliminate it. It is our opinion that reducing the operating frequency requirement to 120 Hz offers no tangible benefit to lamp manufacturers and unnecessarily opens the door for potentially poorer lamp quality, ultimately endangering the adoption of solid-state technology by consumers.

Aside from the engineering aspects, there are potentially larger issues relating to public health. There is evidence that suggests flicker less than 150 Hz can cause seizures in epileptic patients, despite being unnoticeable to the human eye. Until 120 Hz is deemed safe through more extensive studies, it seems prudent to maintain the current requirement of 150 Hz.

Thank you for your consideration.

Sincerely,

Curtis Davis  
Vice President  
Cypress Semiconductor Corporation