

# Comments on Draft ENERGY STAR SSL

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- 1) The example given for a CRI 'tradeoff' with efficacy lists 50% fixture efficiency for CFL's in downlights. I see where it states that this 50% is used for all of the niche applications listed, but it took me several readings and some confusion before I was able to see that 50% would be used for all of the niche applications. It could be stated more explicitly that the equation applies for all of the examples.
- 2) The equation can be reduced to ease application. One example would be to use:  
 $\text{Efficacy} \times \text{CRI} = 2320$ . You could also make a table for various efficacies:

CRI	min. Efficacy
50	46
51	45
52	45
53	44
54	43
55	42
56	41
57	41
58	40
59	39
60	39
61	38
62	37
63	37
64	36
65	36
66	35
67	35
68	34
69	34
70	33
71	33
72	32
73	32
74	31
75	31
76	31
77	30
78	30
79	29
80	29

- 3) As a lighting engineer, I think I understand your zonal lumen angular requirements, but I don't see any definitions or references to definitions for these angles. Will these definitions be included? It would be helpful if all of the angles described in the requirements were defined with respect to spatial planar reference surfaces.