



### **LEDnovation Comments on Energy Star Integral Lamp Specification – Draft 3**

LEDnovation is pleased to provide the following input regarding Draft 3 of the Integral Lamp Specification. We see significant improvement and detail in the Draft 3 specification and would like to thank the DOE for all of the hard work and effort required to create a specification that benefits the end consumer while simultaneously not placing unnecessary constraints on the manufacturer.

#### **Page 6: Dimming**

Is there a schedule for dimming standard being created in conjunction with NEMA?

#### **Page 6: Warranty**

Is the date of purchase considered the date the OEM sells the lamp, for example to a distributor, or is the date the end user purchases the lamp? If it is the date the end user purchases the lamp what is required of the OEM (if anything) to track this date or is the responsibility on the end user to register the product with the OEM to lock in the sale date?

#### **Page 15: 8A) Option for early initial qualification with LM-80 and in-situ temperature measurement**

Why limit this to lamps with a single color of or phosphor converted? If an integral lamp uses multiple colors of LEDs and LM-80 data exists for each LED in the system why is this not acceptable?