

Hi Alex,

Thanks for the opportunity to submit comments on the new proposed spec. We are concurrently working with Michael Poplawski from the DOE SSL Program on the Model Specification for LED Roadway Luminaires Version 1.0; looking at User Guide input and draft language.

There were a couple items we wanted to discuss with you on the proposed Energy Star spec:

1. The inclusion of the UL8750 spec in addition to UL1993 which is called out. UL 8750 is a relevant to include since it's the primary standard for Light Emitting Diode (LED) equipment for use in lighting products. In addition, it references UL 1993 for self ballasted lamp requirement. UL 1993 makes no mention of UL 8750.
2. Surge Testing: The spec maintains the same ringwave 2.5kV 100kHz test but references C62.41.2-2002 Category A test which is 0.5us 100kHz Ring Wave: 6kV/ 0.2kA (30ohm source). We propose that the Category A spec be the primary reference. It is a bit more stringent but better characterizes switching transients and inductance effects from power lines that these luminaires may be subject to. It will promote better reliability of lighting products that have earned an Energy Star seal.

**Transient Protection Requirements: All Lamps**

Lamp Type	ENERGY STAR Requirements	Methods of Measurement and/or Reference Documents	Supplemental Testing Guidance
All Lamps	Lamp shall survive 7 strikes of a 100 kHz ring wave, 2.5 kV level, for both common mode and differential mode.	Measurement: ANSI/IEEE C62.41.2-2002, Category A operation.	<b>Sample Size:</b> 5 units per model. Units shall be tested base-up unless the manufacturer restricts specific use or position. If position is restricted, units shall be tested in restricted position. The sample shall be a unique sample for this test. <b>Passing Test:</b> All units shall be fully operational at the completion of testing.

Would you have an hour for a conference call the week of Nov 14<sup>th</sup> so we could discuss our recommendations live? Please advise what works best for you.

Thanks again for the entertaining our input.

Best Regards,



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