

Email Received on August 4, 2008

EPA Energy Star
Lighting Manager
Dear Mr. Baker

I thought that EPA possibly must spend five years to discuss all questions and set test requirements for RLF V4.2 Table 4 LED product such compared EPA has been did a line voltage socket for CFL able in RLF to usage was spend 4 years. But before your Table 4 eligibility criteria comes out, the consumer force to suffer injury already cause market have an developing message from that RLF V 4.2 the LED fixture will be intended Energy Star qualifying because five years later all consideration subscribe before the test method comes out does not gather to require trash product. There have no any law not to be possible to forbid trash to selling. Is in harmony with the truly LED product five years later when be come, they will have very big combat with trash LED price. Also does not have the law to limit by that time have the Energy Star logo product only able to be possible to import, only able to selling. The Energy Star LED product will be have competitions with trash and very difficult to sale.

Has not participated in trash product that will crush the real Energy Star LED product in near of future such similar EPA supported that GU24 LVS + GU24 Integral CFL situation.

Is in harmony with all met RLF V4.2 spec that GU24 product are not yet have in the market. A lot of do not join Energy Star trash GU24 product have import bigger value 100 time and speeds to enter the market than qualifying GU24 CFL. Have no any law and no anybody anti- files. No- Quality, Non-qualify No efficient No life time GU24 is winner, more profit will make importer going that it is only business rule in history is never be change. Consumer would never know and never care difference quality in between when has one dollar price difference they just go for.

I did circuit test after 01 Aug 2008 for end of life on EPA after April 15 2008 issued GU24 Platform products. The TCP product have work the rest are Not these circuit cost is big difference the labeling Manager should check on them for end of life requirement??

EPA cannot spend one more five years cause budgets won't support for that long. Please spilt-up that RLF V 4.2 Table 4 test procedure to three phases is my opinion.

1 . Phase one: How to test that LED with each one manufacturer's product ?

Lumen per watt
Lumen maintains
CRI maintains
CCT
Lift time

The big problem in this phase is CRI of LED will be reducing down very fast. At 5 thousand hours life time it may down to 50 from >80 that will hurt the eye health for people. I believed sooner will be have a case in the Court.

May I suggestion for that the manufacturer of LED shall write a warranty for how many thousand hours be sure that CRI will be higher then 75 or ??

When manufacturer done the tests result the EPA may issues first Platform to them. No platform product un-able to sale in U.S.A. Department should be to create this law. If does not create this new regulation in near of future first. The trash LED will be had thousand and thousand more then high quality LED. The RLF V 4.2 Table 4 real product will be absolute died such similar RLF program V 3.2~4.1 wasted a lot time just increase a new business for GU24 trash. Only help is program worker got pay for many years that is all.

2 . Phase two: manufacturer to assembling LED lamps

How to test that LED lamp's quality and driver life time?

First at all please consider the light bulb will be had types? for applications to use?

Full angle A-19 bulb type, 1 W LED x 7 or 1 W x 9

This bulb is for portable desk light application to use

Spot type R type bulb 1 W LED x 3 or 3 W x 1 or 5 W x 1.

Face penal type 1 W LED x ?

Linear type 1 W LED x ?

The driver for above types minimum shall have ?? current out put.

What is 120 V socket will be provided the power to DC driver for above diffident type replacement LED bulbs?

It can not to use any existing screw base socket.

The DC driver shall able replacement and recycles.

When phase two LED bulb's manufacturer done that life time with cooling and driver and driver holder design for full angle and spot type. This driver holder shall be is compatibility for all current output lower then ? wattage types.

The face penal type shall use a quick jacket the linear type shall use a new G3 socket standard to holding it on the under cabinet fixture and shall be have a driver holder connected by quick jacket on two ends. EPA and ANSI should design a DC voltage quick jacket standard.

EPA may issues that lamp and socket and drive combination platform to LED bulb's manufacturer.

3 . Lighting Manufacturer may use combination source of phase two platform to fit on various indoor and outdoor fixture. But they should keep cooling with carry the best light output design. Than the Table 4 fixture will be as Energy Star qualify product.

I have all kinds LED fixture in my show room included you never saw. They just like Mr. Ruud said all LED fixtures are not the same. In oversea here is no any one LED lighting manufacturer similar each other. We won't production LED lamp and fixture in next three years we shall always guarantee the solution to our business partners we are wait for CRI and cooler completely and shall have guarantee. No CRI guarantee we won't start the LED business.

No one else will mind Congress may select DOE to operation new SSL program or EPA have release RLF V 4.2 Table 4 or my suggestion DOE to controlling phase one of the SSL source for commercial and residential. EPA may controlled phase two and three by RLF V 4.2 Table 4 for LED residential fixture. We just do not want to see two Agencies both waste time and consumer will be force to suffer injury always.

Best regards

Edi Chang
President
Biglight Co';Ltd.