

ACS would like to add the following comments for consideration in revising the luminaires specification.

- 1.) We would like to see a table similar to the Lamps specification were EPA specifies exactly what additional tests are required for each allowed variation.

- 2.) We have seen cases where dimmable luminaires would pass the Audible Noise test without a dimmer but would fail on a dimmer by 10db or more. Dimmer position did not seem to impact the noise level. We would like to see the Audible Noise test revised to require dimmable luminaires to be tested with a dimmer in the circuit to ensure audible noise does not exceed 24dBA while operating on a dimmer.

Thank you,

*Best Regards,
Randy*

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