

**Rogers, Daniel**

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**From:** timerhuang <huangguangsheng@dangoo.com.cn>  
**Sent:** Friday, February 10, 2017 12:39 AM  
**To:** ENERGY STAR Lighting  
**Subject:** ENERGY STAR Lamps 2.1 First Draft Comments

Dear Jantz-Sell,

Thank you for the opportunity to review and provide comments on Energy Star Program Requirements for lamps Version 2.1 First Draft. The below comments are submitted on behalf of Shanghai Dangoo Electronics Co., Ltd.

1. 15,000-hour minimum lifetime proposed for all LED lamp types.

Now all minimum lifetimes have adjusted to 15000H, while the lifetime of LED package from LM80 is more than 36000H, even more. If the in situ temperature of highest temperature TMPLD, and the forward drive current meet the requirement of Energy Star, suggest to release the Final Certification but not Early Interim Certification. Directly refer to LED LM80, it same as the ENERGY STAR Luminaires 2.0. Of course, EPA can collect the lumen maintenance testing data from the market to assess the risk.

2. LED package as an allowable variation for family groupings.

This is good news for LED lamp manufacturer. We have more choice in using LED.

Question: Will the number change of LED package in a lamp affect the certification? For example, we have get the certification of a lamp with 9pcs LED, while our customer need us to change the number of LED from 9pcs to 10pcs (LED model and manufacture are same) . If need do the certification again?

Suggest: The less number of LED can cover the more number of LED basic on the same LED.

3. Other Issue:

The lamp has passed the lumen Maintenance of 6000-hr test duration. While the TMPLD is higher than the test temperature of LED LM80, will it affect the certification?

Thanks!

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