3933 US ROUTE 11
CORTLAND, NY 13045

Telephone: +1 (607) 753 6711
Facsimile: +1 (607) 758 6637
www.intertek.com

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Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the Draft 1 changes for Luminaires.

Additional Retrofits

Intertek is pleased to see the additional of non-directional wall sconces and ceiling mount retrofits added to the eligibility list and hopes to see this category further expanded to meet consumer demand.

Inconsistency between LED Light Engine and LED lamps as sources

It is well known that as an LED product increases in temperature the light output decreases. Additionally, ETLOR laboratory testing currently shows consistent drops in light output over normal elevated temperatures with standard LED lamps.

The LED engine portion of Draft 1 contains a requirement for LM-82 testing in order to chart the insitu temperature against this known trend of light output vs. temperature. However, luminaires that include screwbased LED lamps do not require this temperature check even though LM-82 covers both products. With this evidence both LED Light Engines and LED screwbased lamps should undergo a LM-82 test to plot the insitu temperature against the light output trend to ensure the light output and efficacy are still being met.

Product Families – Product Wattage

We find this section confusing and would ask for more clarification on proper reporting for this variant. Requiring the highest wattage in a product to be tested will result in the most ideal performance results to stand for the family and will cause additional utility rebate confusion unless the EPA submission forms are changed to allow a range of wattages instead of just one reported wattage.

In addition, this section calls out an allowed CCT variation but also requires testing on “highest CRI”, indicating there are more variances allowed. This section will be used heavily for undercabinet and recessed can lighting and needs further clarification on reporting the ranges of data that will be captured.

Start Time

Intertek strongly recommends that the draft requirement of 0.5 seconds be moved back to 1.0 seconds and the test method clarified including no pre-warming of the drivers. One second has been used as a satisfactory consumer benchmark since the program began in 1999 and unless there is a new consumer demand to lower it, this new time requirement will only unnecessarily increase the inrush current to the LED circuitry.

Undercabinet Zonal Lumens

We would like the zonal lumens requirements to be eliminated to allow flexibility in consumer preference which is extremely subjective and replaced with a limited and simple graphic of distribution patterns with more consumer friendly terms such as “cone” (axial) or “throw” (bisymmetric) etc.

Color Angular Uniformity

This section does not currently contain language to limit the vertical angles to the beam (50%) or field (10%) angle to eliminate the necessity of measuring low light level conditions that border on noise or uncertainty as discussed. The lamp specification contains the term “beam” to clarify this measurement for directional lamps.

Intertek looks forward to participating in the future draft revisions and is available to provide additional details and data.

Best regards,

Jacki Swiernik
Staff Engineer – Energy Efficient Lighting
Intertek
3933 US RT. 11
Cortland, NY 13045
Phone: (607) 758-6231
Email: jacki.swiernik@intertek.com
Skype: JSwiernik