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March 13, 2015

Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the Lamps V2.0 Draft 1 specification. We appreciate all the study and time that has gone into this specification. Please refer to the below comments and section numbers for review:

Section
No.

5.1 Testing Color Tunable Lamps

Intertek appreciates the addition to broaden the scope with this category. The testing path seems clear.

9.8 Color Maintenance

To simplify or alleviate the confusion on exactly what is meant by the “total distance of 0.007 on the u’v’ diagram”, we would request to simplify this requirement to “stay within the 7 step LED quadrangle matching the rated CCT certified with all measured points throughout the entire life test”. If the consensus is the quadrangles were put in place to contain the boundaries that humans were unlikely to differentiate between per a specific CCT, the same target requirement could be copied over into this section. Currently laboratories are interpreting this requirement in two different ways: linear along the u’ or v’ axis, or by using a diagonal vector.

11.4 Start Time

We are still concerned that reducing this start time to 500 milliseconds is unnecessary and may create design restrictions for products that are compatible with various controls. We feel consumer dissatisfaction primarily arises from CFL runup time and is often confused with the start time requirements by layman. The previous written clarification of the test method is adequate to control different interpretations.

12.5 Audible Noise

The reference standards called out in this section still refer to chambers with very low background levels that only fully anechoic chambers can achieve, with no additional written guidance or allowances that previously have been expressed verbally. As a CB, we have seen many custom chambers created that do not expressly meet the written references, making the test equipment as varied as it used to be prior to Lamps V1.0.

We would ask that the verbal allowances or tolerances be clarified and published in writing, or alternatively, a statement be included that allows chambers to be used that meet the background level





of "x" where "x" is the agreed upon background level below 24dbA. This would be hugely helpful to the partners, CBs, and first and third party test labs so we are all on the same page.

Maximum Light Output, Minimum Light Output, Flicker, and Audible Noise.

12.2-

12.5

Using a sample size of five dimmers, two light levels, and two loads creates a huge amount of data and high costs that is burdensome to the partner as dimmers are changing as rapidly as the products and are not consistently designed. We would request the sample size be reduced to two dimmers, one each of different design.

We thank you very much for your time and consideration.

Best regards,

A handwritten signature in black ink that reads "Jacki Swiernik".

Jacki Swiernik – Staff Engineer and Energy Efficiency Lighting Category Lead

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