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Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the launch of the revision process to Luminaires V2.0, Draft 2. The luminaire industry continues to evolve and we are eager to see the updates and provide feedback to simplify and streamline the testing and certification process.

PRODUCT WATTAGE – FAMILY GROUPING

Please clarify the allowed wattage range of family members that are to be certified on one line on the website. Testing the highest wattage in a family will often result in the highest lumen output. Certifying a family on one website line with a variance of several watts will reflect false performance results.

START TIME

Intertek continues to oppose the reduction to 500 milliseconds for luminaires as unnecessarily restrictive as it will create more inrush current to reach the light source. The vast majority of layman confuse the unwanted runup time of some CFLs with start time. They are not the same.

ZONAL LUMEN DENSITY- UNDERCABINET LUMINAIRES

The current EPA program definition for this category is this:

“Luminaires installed below an upper cabinet to direct light down to the work surface of a countertop or desk for task lighting.”

The zonal requirement for 0-60° vertical is important for this definition. However, the zonal requirement for 60-90° is simply **decorative** and very subjective to each customer. We believe this regulation of a decorative feature should be eliminated for the following reasons:

1. It is not accurate to simply divide the zonal lumen measurement of an axial or quad distribution in half and call it “hitting the backsplash”. A percentage is distributed out to the sides. The suggested road report or BUG calculation method commonly used for roadway lighting does not cover side lighting either.
2. The vast majority of the manufacturers prefer to not designate the mounting orientation or exact placement underneath the cabinet in their packaging instructions because that is a subjective, decorative choice better suited for the customer to make based on their own preferences and kitchen decor.
3. We do not believe it is important for the bottom edge of the cabinet to be illuminated at 90 degrees vertical from the luminaire along the back wall. It is the task lighting on the counter that is important as correctly indicated in the definition section.



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SSL DOWNLIGHT RETROFITS

The guidance given to different laboratories on whether or not the lumen output and efficacy measurement for downlight retrofits is not consistent. Please clarify whether or not this performance requirement in section 9.2 is required to be tested in a worst case downlight housing the retrofit is rated for. Comparison testing at our laboratory has shown a 5% - 30% drop in LED light output due to the higher thermal conditions and/or reflectance issues when a retrofit is mounted in a black reflector, IC rated recessed can. The ETLOR testing for lamps verifies this same concept.

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

Best regards,

A handwritten signature in black ink that reads "Jacki Swiernik". The signature is written in a cursive, slightly slanted style.

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