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Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the Lamps V2.1 Draft 1 specification. I hope you find the below comments helpful.

Section  
No.

7.1 Product Variations – LED Package

Dimming and Flicker test results as well as Audible Noise testing are dependent on the driver design rather than the LED package design. It is not necessary to repeat those tests.

9.2 Rated lumen output and wattage on packaging

Currently the “reported” initial light output is called out in the standard but the Directive 2011-05, Measured versus Reported Values for ENERGY STAR Certification, also requires measured values to comply. This is causing a lot of confusion, especially in the APAC region where many of these manufacturers are from.

On the bottom of page 14 under section 9.2 there is a footnote #4 that states “Consistent with FTC and DOE regulations, reported values may be more conservative.” However, LED bulbs have now been rolled under the DOE category of “General Service Lamps.” Similar to their CFL counterparts, the lumen output under FTC 16 CFR section 305.15 for general service lamps may round the average lumen output to the nearest five. This may or may not be more conservative, depending on the average of the measured values, which may end up rounding up.

The Supplemental Testing Guidance also contains a third contrary statement regarding reported values of LED lamps being rounded to three significant digits.

Please include clarification in the standard regarding measured vs. reported now that the federal regulations are in effect for packaging ratings, as it is very confusing. For example, if a partner did not wish to claim wattage equivalency on their packaging or product literature, how would CBs know the light output passed a minimum level at all? How should Verification Testing be compared?

Similar to light output, the FTC does not define rated wattage as more conservative in FTC 16 CFR section 305.2(hh) nor 10 CFR 430 Appendix W to Subpart B.

We thank you very much for your time and consideration.

Best regards,

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