



NEO-NEON LED LIGHTING INTERNATIONAL LTD.

Dear Ms Ann Bailey,

Thanks for your providing us a chance to participating in the draft revise relating to lighting Partner Commitments,

My comment is as the following 2 points :

- 1) The below abstract is from <ENERGY STAR Program Requirements –Solid-State Lighting Products (SSL) Partner Commitments >,

Verifying Ongoing Product Qualification

6. Participate in third-party verification testing through a Certification Body recognized by EPA for SSL products.

Note: It is EPA's intention that until further notice, this commitment will be satisfied by participation in the existing Quality Assurance Testing program (QA-4) mentioned in the Residential Light Fixture specification.

But actually, Solid-State Lighting (SSL) specification has itself **Quality Assurance (QA) Testing requirement, which is different from Residential Light Fixtures Quality Assurance (QA) Testing program (QA-4)**

Please check the their difference as follows::

<**Residential Light Fixtures - Eligibility Criteria -Version 4.2** >,

(Note: QA-4 is created in the <Quality Assurance Testing> of Version 4.0):

- A. **Quality Assurance Testing (QA4):** EPA will select fixtures, platforms, and/or replacement lamps each year for quality assurance testing. The manufacturer of each selected product will be required to commission third-party testing of the specified fixture, lamp, or platform by a manufacturer-independent testing lab. The testing lab will procure three (3) samples of each fixture or ten (10) samples of each platform or replacement lamp on the open market (if possible). Specific testing details are outlined in the Procedures Manual.

<**Solid-State Lighting Products (SSL) -Eligibility Criteria – Version 1.1**>:

Quality Assurance (QA) Testing

Manufacturer partners selling approved ENERGY STAR SSL luminaires will be required to participate in a quality assurance testing program, which will use independent, third-party, qualified testing facilities. This third-party testing program is necessary to provide an active system to verify quality of ENERGY STAR qualified SSL Luminaire products in the marketplace. The information provided below is a general description and summary of the QA testing program. Detailed policies and procedures will be available in the ENERGY STAR SSL Quality Assurance Testing Program Manual.

- A. **Overview:** Qualified luminaires will be selected for QA testing both on a random basis and through a product nomination process. The manufacturer of each selected luminaire will be required to commission third-party testing of the specified luminaire by a manufacturer-independent qualified testing lab. The testing lab will procure three (3) samples of each luminaire through normal market channels. Each luminaire will be tested for:

So, I propose “Note” in SSL-Partner Commitments to revise as the following:

Note: It is EPA's intention that until further notice, this commitment will be satisfied by participation in the existing Quality Assurance Testing program mentioned in the <**Solid-State Lighting Products (SSL) specification.**



NEO-NEON LED LIGHTING INTERNATIONAL LTD.

2) I find the same requirement of item No. 8 and 11 in the Partner Commitments of <Solid-State Lighting Products (SSL) and <Integral LED Lamps>, but only find item No. 10 in the Partner Commitments of <Decorative Light Strings>,<Residential Light Fixtures>,<Compact Fluorescent Lamps (CFLs)>,

Please check the following :

Partner Commitments of <Solid-State Lighting Products (SSL) and <Integral LED lamps>:

8. Notify ENERGY STAR integral LED lamp Certification Body recognized by EPA for integral LED lamps, within 30 days, if the designated suppliers of any qualified private labeled integral LED lamps changes to a new supplier.
11. Notify EPA of a change in the designated responsible party or contacts within 30 days using the My ENERGY STAR Account tool (MESA) available at www.energystar.gov/mesa.

Partner Commitments of <Decorative Light Strings>,<Residential Light Fixtures>,<Compact Fluorescent Lamps (CFLs)>:

10. Notify EPA of a change in the designated responsible party or contacts within 30 days using the My ENERGY STAR Account tool (MESA) available at www.energystar.gov/mesa.

I am confused why there is difference for the above 2 categories, I also think the item No.11 may cover item No.8, and to delete Item No.8 , because the definition of “designated responsible party” may cover “designated suppliers”.

Thanks for your kind attention,.

Peter Tao
CERTIFICATION & TESTING CENTER
NEO-NEON LED LIGHTING INTERNATIONAL LTD.
HESHAN LIDE ELECTRONIC CO.LTD.
Tel:(86) 750 8318 092
Email:petertao@neo-neon.com
[Http://www.neo-neon.com](http://www.neo-neon.com)

