

U.S. EPA
ENERGY STAR Lighting Program Manager
Mr. Jantz-Sell

My comments for lamps V 1.0 specification are:

1. Please repeat the 1st draft language as following into that Lamps V 1.0 Specification.

This Specification does not include:

- Lamps that operate on an external (i.e. not integral to the product) ballast, driver or transformer. This includes linear fluorescent lamps, discrete “pin-based” compact fluorescent lamps, LED replacement lamps for linear fluorescent, and low-voltage lamps (e.g. 12V MR-16).
- Lamps powered by an internal power source, e.g. solar.
- Lamps including other power-consuming features which do not provide useful illumination.
- Lamp technologies without applicable industry standardized methods of measurement.
- Lamps with bases not detailed in ANSI standards.
- Zhaga-standardized LED light engines.

There is a question how to know that which LED engines are made by Zhaga group? On surface of LED engine did not have marking about, EPA should provide a list such as information before lamp’s manufacturer pay the test fee. And help CBs to review it.

2. U.S.A. is a member of United Nation. The UNEP was on 2013/01/19 had a Global control mercury agreement in Geneva; and the European Parliament of the Council will be review official Journal of that directive 2011/ 65/ EU before ending of June 2014.

Both council will be desires to tight that allowable Hg contain value limit for CFL. The Lamps V 1.0 effective date is one year after announcement date. EPA shall match both future policies on the restriction of the use of certain hazardous substances for mercury contain value limit for CFL.

3. The lamp Labeling.

Shall have marking shall be printed correct mercury contain values on CFL product.

Such as Hg <?.?mg print on the lamp.

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