

Email received on June 14, 2010 from Edi Chang.

Dear Sir.

Please be take my suggestions into second draft of luminaires specification V 1.0 as following

In page 8 Technical Notes please add

(9) For cleaner environment the Energy Star products shall meets all environment applicable state laws. The material shall able to recycling and reuse, shall never use any against environment coating and hazardous substance concentration process. (i.e. This product not used any against environment material and hazardous process.) Shall write recycling and reuse process take by manufacturer or by which company in warranty for consumer.

The GU24 integral CFL in luminaires specification V 1.0 first draft it has been disable as lamp source for Energy Star qualifying Luminaires to use, So please not showing that GU24 language in pages of source type. Just have Note as V1.0 in the page 37. **Appendix A.** Below pages please [mark-off GU24](#) in source type on second draft.

Including: Page 10. **Luminous Efficacy and Output Requirements:**

page 15. **Light Source Life Requirements:**

page 16. **Lumen Maintenance Requirements:**

page 18. **Correlated Color Temperature (CCT) Requirements:**

page 19. **Color Rendering Requirements:**

page 21. **Lamp Shipment Requirements:**

page 22. **Source Start Time: and Source Run-up Time:**

page 23. **Lampholder Requirements: and Dimming:**

page 25 **Power Factor:**

page 26. **Transient Protection:**

page 27. **Lamp Current Crest Factor:**

page 28. **Operating Frequency:**

page 29. **Ballast/Driver Replaceability: and Noise:**

page 30. **Thermal Performance Requirements**

page 32. **Recessed Downlight Thermal Performance Requirements**

page 33. **Indoor Luminaire Safety - Portable Luminaires - Hardwired Luminaires and Electronic Ballast Requirements - Safety - Ballasts and “Non-Edison base Fluorescent Adapters”**

page 34. **Product Labeling & Packaging Requirements**

[Please moved that GU24 in Source Type fluorescent sources of all above pages.](#)

In page 18. **Correlated Color Temperature (CCT) Requirements: Required Documentation**

Sample Size: ≥ 10 lamps must be tested [3], [8] [if 4100 k lamp pass the test than all others CCT lamps with same wattage rated by same ballast are allowed as platform source. One tested result will be accepted same wattage lower CCT lamps of same manufacturer.](#)

In page 21. Lamp Shipment Requirements: please add following [language](#):
All luminaires must be shipped with a lamp for each lampholder. The shipped lamp must be have informations as following:

- weight < 1.5 or < 2.5 mg of Hg has been in the tube shall printed number on lamp.
- the symbol “Hg” within a circle
- “Contains Mercury” Additional information may also be printed as required by applicable state laws.

On shipped lamp product packaging:

Language for mercury must include the following:

- the symbol “Hg” within a circle;
- and weight < 1.5 or < 2.5mg of Hg printed on packaging
- “Contains Mercury”; and • www.epa.gov/bulbrecycling or www.lamprecycle.org

In page 23. **Lampholder Requirements:** please add following [language](#)

Energy Star requirement.

The lamp holder must be designed to accept lamps with ANSI/IEC standardized lamp base configurations for all that (T3 or T4, or T5 or T8 that spiral, linear, or circline) applicable wattages. For example, An universal ballast which is able operated lamps with minimum three wattages (e.g., an 13W, 18W, or 22W lamp) or (e.g., an 18W, 23W, or 28W lamp) then the lamp holder must be designed to accept lamps with ANSI/IEC standardized [pin-based](#) configurations for all three applicable wattages. [Acceptable lamp holder combination must be compatible for indoor / outdoor luminaires less have two or more categories to using if the applicant apply platform who is provide combination source for various manufacturers not for self-use.](#)

[This accepted compatibility pin-based CFL lamp holder disable to rate any LED.](#)

[Please more clear of this point language for Chinese manufacturer when EPA done that third draft. May I have to view it make sure no any Chinese culture confusion about translation from western before release.](#)

In page 23. **Dimming: Directional and Non-Directional Luminaires**

Energy Star requirement.

My suggestion: A ballast which is able to rate multiple wattages than must be have damming that lower rated lamp at 30 % . and

Any system rate greater than 13 W shall be have dimming that luminaires rated power at 30 %.

I have an importance comment for 2011 new luminaires V1.0 please accepted.

The Partnership Agreement shall added [language](#) as following:

[Partnership signed by manufacturer who is elected a platform source to have qualified product he/she online submittal to join as partner of program who shall provide a platform owner signed agreement between manufacturer, both shall responsibility to EPA. Warranty that approved products will be keeping as qualified platform source and quality will be met that Lab tested file always. Once platform owner Note to EPA no longer provide qualified lamp and ballast source to agreement signed manufacturer, or platform source user no longer purchased in six months then the partner must be resubmit](#)

that changed platform to EPA within 30 days or have right to appear one time. If does not meet this requirement his name will be moved from list.

Also same Note language shall have written on QPI form for online submit.

In past three years was big problem on case of GU24 integral CFL. Was had high number manufacturers online submit as partners with use GU24 platform file. Once got EPA issued joined program on list as partner than never back perches GU24 CFL with origins platform's owner. They bought low price 60 cents no quality GU24 lamp which just had that certified by UL put-into shipment and no one known that in U.S.A.

Government Agency may issued order to recalled back all that disqualified product which have cheated to program.

If EPA does not stop this leak for program the 99% disqualified CFL, LED and SSL lamps will be easy into entry market breakdown all of enhancement rules.

c.c. To: EPA Energy Star Product Manager Mr. Baker

Best Regards

Edi Chang
President
Biglight Co., Ltd