

Please see Bridgelux comments on:

ENERGY STAR Specification for Lamps (Light Bulbs)
Version 1.0 DRAFT 2

Page 15 Color Rendering

CRI ≥ 80 for all lamps. Difficult to achieve ≥ 80 CRI on Cool White, and the higher CRI reduces efficacy.

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Color Angle Uniformity

Why are CFL lamps exempt if the specification is technology neutral?

Page 19 Lumen Maintenance and Rated Life Requirements

Extended life claims:

Change luminaire specification to match lamp specification.

Does the statement 'A tolerance of -3% may be applied to lumen maintenance averages' mean that a product will pass the test with 92% lumen maintenance?

'All directional and semi directional lamps, and all omnidirectional lamps \geq shall be tested in accordance with the Elevated Temperature Test.'

This will be difficult for manufacturers developing 15W application to test to Energy Star test configuration and maintain required temperature and thermal requirements.

Annex C

Test Procedure

Has the SSL Test Procedure Committee verified the validity of the proposed Elevated Temperature Initial Light Output Ration test?

Recommend a more precise definition for location of temperature measurement points.

Note it is difficult to maintain 55°C on SSL in fixture for high power lamps

Annex D: ENERGY STAR Start Time Test

Difficult to maintain ambient temperature to within +/- 1°C.

Regards,

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