

May 16th, 2013

Dear Sir,

Tospo respects and values its relationship with the EPA and welcomes the opportunity to comment on the recent draft of the ENERGY STAR® Product Specification for Lamps Version 1.0 Draft 4:

- **Compact Fluorescent Lamp (CFL)**

1. Start Time:

Comments: 100ms start time is a kind of too tough for cover CFL bulbs, especially the cover bulbs with higher watts than 20W. Please kindly consider to revise the 100ms to 1S.

2. Rapid Cycle Stress Test

Comments: 5000times cycle time is too much more critical than previous 4000times, technically there will be a big change on the Filament to reach 5000times, which may bring up to higher cost. The request of Rapid Cycle Stress for cover lamp is better revised to 4000time from 5000times.

3. 40% Lumen Maintenance

Comments: 45°C ±5°C operating temperature is very tough for the lamps whose wattage is more than 10W, we suggest used 25°C ±5°C for the operating temperature

4. 40% Life time

Comments: Cause there will be some possibility that the CFLs are Fragile, we would your consideration to allow to get one unit be failure within 1000hrs testing, and two units is allowed to be failure within 40% life time.

- **Light Emitting Diode (LED)**

1. Lumen Maintenance

Comments: 45°C ±5°C operating temperature is very tough for the directional lamps whose wattage is less than 10W, and not quite often to suggest to use under such high temp. We suggest to return back to 25°C ±5°C for the operating temperature for the directional lamps whose wattage is less than 10W.

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