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To whom it may concern:

Thank you for the recent webinar and opportunity to comment in Draft 4 of Lamps V1.0. Please find my comments below:

1.2 Excluded Products:

Please clarify whether lamp types that are not integral to the ballast but connect together with a custom connector and are sold together are eligible for the program. (example: "Circline" and "Square D").

7.1.2 Product Variations – Insitu samples

A sampling rate of five samples for insitu testing is high and cost prohibitive. Please clarify the language "of up to five units" in the paragraph. Can only 1 or 2 lamps of the variant be measured?

9.1 Luminous Efficacy – Lamps covered by DOE's Regulatory Program

Please clarify whether the test methods and/or the pass/fail requirements for integrated medium screwbase lamps (without reflectors or multi-level capability) are to be followed in 10 CFR Part 430 Appendix W to Subpart B for this lamp category. Both bare lamp efficacy and sampling rate in CFL V2.0 (2001) is lower than the stated Omnidirectional category of Lamps V1.0 Draft 4.

12. Dimming Performance

Dimmers marketed to residential customers rarely have the following marked on the dimmer packaging:

- Single Forward Phase Shift
- Double Phase Shift
- Electronic Low Voltage/Reverse Phase
- Microprocessor with Power Supply
- Voltage Compensation

Laboratories would request EPA to include these definitions so that labs are purchasing dimmers with similar characteristics for testing.



12. Dimming Performance (cont'd)

As a participating lab in the current EPA/NEMA round robin testing, we appreciate the deletion of one of the required lower dimming levels and the shortened stabilization time allowances. However, testing is still burdensome with 10 dimmers and still requires 60 data points for one lamp model. Intertek would request that the dimmer number be reduced to a maximum of four dimmers if the dimmers vary in accordance to the 4 points covered in this section.

Ambient Temperature Life Testing Addendum – 2. Applicability and 6.1A, 6.1C, 7.1B, etc

These sections discuss SSL lamps, but does not mention CFL lamps as described in the Lumen Maintenance Requirements Section 10.1 (not covered by DOE). Please clarify if this is a typo, or if CFLs (not covered by DOE) are intended to follow separate ambient life testing paths in accordance with LM-65.

Start Time Addendum – 5.1D (Runup Time 5.1D)

Previous internal laboratory experiments with CFLs show that the “off” time prior to start time measurement is sufficient at 12 hours and longer off times do not significantly influence start time results. 20 hours will add an unnecessary additional day of testing time which may be unwelcome by the partners.

Start Time Addendum – 9.1 – CFL graphic

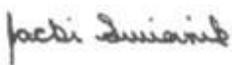
Graphic showing start time as measured between lamp arc voltage and light output trace is contrary to section 7.1D where oscilloscope is set to measure input voltage and light output. **Additionally, measuring start time from the lamp arc voltage point is measuring only the lamp behaviour and not the platform system behaviour, which is what the consumer is looking at.** (Ex: I walk into a room, turn on the light, I want it to turn on, and am not interested in what the separate components are doing.) Picking up the lamp arc voltage in integrated CFLs will also require damaging the housing and attaching to delicate wires which will inflict a large uncertainty into the measurement.

Runup Time Addendum – 7.2 and 7.3 – Relative vs. Absolute

These two test methods currently describe the same steps. Relative method is stabilizing a lamp, measuring light output in a sphere (or similar), calculating the runup time point, taking the lamp out, letting it cool back to ambient temperature in the off state (for “x” hours), then returning it to the same exact light output equipment and tracking light output at 1 second intervals until it reaches the calculated runup time point. Care must be taken to ensure that the lamp is placed back in the exact same position (which is why an integrating sphere is useful for this.)

Thank you for your time and consideration of this comment period.

Best regards,



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Intertek