

Dear Sir/Madam,

Our comments on the final draft of Lamp Specs is as follows on the Lamp Labeling Requirements:

The draft requires that lamp model number or retail SKU number be printed on the **lamp** as it appears on the ES Qualified product list.

The old ES CFL and LED Lamp specs do **not** require that a lamp's ES model number or retail SKU number be printed on the lamp as it appears on the ES Qualified product list.

The old ES CFL and LED Lamp specs require that a lamp's ES model number or retail SKU number be printed on the **packaging** as it appears on the ES Qualified product list.

**We think that this new labeling requirement in the draft should be removed for the following reason:**

For the same lamp, its model number or retail SKU number will vary with packaging types. For example, for the same lamp, its packaging types may be color box and clamshell. A color box may contain one lamp (1-pack), two lamps (2-pack) or 3 lamps (3-pack). In this case, the same lamp will have different model numbers or retail SKU numbers, relating to its packaging types.

Supposed that we have an order to produce CFL mini spiral 13W 2700K in 1-pack, 2-pack and 3-pack color boxes at the same time. Their retail SKU numbers are 45601, 45602 and 45603, respectively. During packaging process, when workers pick up a lamp and before putting it into the color box, they will need to look at the ES SKU number printed on the lamp first. If the printed ES SKU number is 45601, then the lamp goes into 1-pack color box. If the printed ES SKU number is 45602, then the lamp goes into the 2-pack color box. If the printed ES SKU number is 45603, then the lamp goes into the 3-pack color box. This will greatly slow down the packaging process and will be easy to get mixed up (for example, a lamp printed with SKU no. 45601 goes into a 2-pack color box by mistake).

Therefore, from manufacturing perspective, this new labeling requirement in the draft should be **removed**. A product's ES model number or retail SKU number should **only** appear on the **packaging** as specified in the old ES CFL and LED Lamp Specs.

We think that the intent of the new requirement is that the lamp (after the packaging has been thrown away) can be matched to the ENERGY STAR list so it can be identified.

A manufacturer may print the same model number on the lamp before they get ES. They may continue to print the same model number on the lamp after they can get ES. Or they may continue to print the same model number on the lamp after a lamp has been disqualified by EPA due to test failure in the third-party verification test. Thus, it is **not** of much use to match the model number printed on the lamp to the model shown on the ES website because the lamp might be made before we got ES or after the lamp was disqualified by EPA. Please note that ES logo is not printed on the lamp to identify if a lamp has ES or not.

Best Regards  
Lu Huang  
Joinluck

Hi Austin,

Thank you very much for taking the time to address our concern

The new wording will not address our concern for the following reasons:

1. We do private labels for customers. Most customers use retail SKU numbers which vary with packaging types.

For the same lamp, people have to use different retail SKU numbers for different packaging types in

order to differentiate different packaging types. If different packaging types have the same retail SKU

number, then warehouse will mix up different packaging types when receiving and despatching goods. In

addition, different packaging types have different retail price. Thus, different packaging types cannot

have the same retail SKU number (retail number).

In short, we cannot use the retail SKU number (retail number) as a model identifier which will appear

on the ES Qualified Product list since a retail number is linked to packaging types.

2. We print UL model name on the lamp. But an UL model name usually does not reflect color temperature and

beam angle because color temperature and beam angle do not affect product safety. Thus, an UL model name

can represent any color temperature and beam angle (an UL model name does not differentiate different

color temperatures and beam angles).

On the other hand, ES requires that if we want to certify a color temperature for ES, we need to send that

color temperature for ES testing. For example, if we want ES on spiral 13W in 2700K and 3000K, we need to

send both 2700K and 3000K 13W lamps for ES testing. 13W in 2700K and 3000K will need different model

identifiers on the ES Qualified Product List in order to differentiate.

Therefore, we cannot use UL model as the model identifier because an UL model may not differentiate different

color temperatures or beam angles

We think that the intent of the new labeling requirement is that the lamp (after the packaging has been thrown away) can be matched to the ENERGY STAR list so it can be identified.

A manufacturer may print the same model number on the lamp before they get ES. They may continue to print the same model number on the lamp after they can get ES. Or they may continue to print the same model number on the lamp after a lamp has been disqualified by EPA due to test failure in the third-party verification test. Thus, it is **not** of much use to match the model number printed on the lamp to the model shown on the ES website because the lamp might be made before we got ES or after the lamp was

disqualified by EPA. Please note that ES logo is not printed on the lamp to identify if a lamp has ES or not.

The old ES CFL and LED Lamp specs only require that ES model or model identifier appear on the packaging. This has worked well and has not created any problems. Can EPA keep it unchanged ?

Best Regards  
Lu Huang  
Joinluck

Hi Austin,

Thanks for the reply.

We suggest the following two options to solve the issue:

1. The identifier may only appear on the packaging;
2. If the identifier needs to appear on the bulb, then we suggest that the identifier may consist of the following three parts:  
UL model + color temperature + beam angle for LED PAR and MR16. For example:  
JL-18W-T2 2700K 40°  
But the three parts do **not** need to be placed close together to avoid misunderstanding by UL.

I had problems sending this email from my usual email account. So I send this email from my hotmail account. Please reply to my **usual email account** which is [huang.lu@joinluck.com](mailto:huang.lu@joinluck.com)

Best Regards  
Lu Huang  
Joinluck