

Dear Sir/Madam,

Our comments are as follows:

1. Lamp Labeling Requirements (model number)

The current ES CFL and LED Lamp specs do **not** require lamp model number to be printed on the lamp as will appear on the ES Qualifying product list.

The draft requires that lamp model number to be printed on the lamp as will appear on the ES Qualifying product list.

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

As per UL requirements, a product's UL model needs to be printed on the lamp. Since color temperatures and packaging types do not affect product safety, a product's

UL model usually does not show color temperatures and packaging types. For example, the UL model of CFL mini spiral 13W is 13W/MS. 13W/MS needs to be printed on the lamp

and it can represent any color temperature and packaging type such as 1-pack (a color box holds one lamp), 2-pack (a color box holds two lamps), 3-packs, and etc.

If it is a 2700K lamp, we print 13W/MS 2700K on the lamp. Here 2700K is not part of the model.

A product's Energy Star model number usually shows color temperature and packaging type.

For example, if it is CFL mini spiral 13W 2700K 1-pack, the product's ES model number is 13W/MS/27K/1. If it is CFL mini spiral 13W 2700K 2-pack, the product's ES model is 13W/MS/27K/2. If it is CFL mini spiral 13W 4100K 3-pack, the product's ES model number is 13W/MS/41K/3.

Therefore, if the new labeling requirement in the draft becomes effective, then we will need to print both UL model and ES model on the lamp. Both models look similar, but not the same.

It will create confusion. In addition, a lamp's base has limited space and does not have enough room to print two models. Finally, supposed that we have an order to produce CFL mini spiral 2700K in 1-pack, 2-pack, and 3-pack the same time. They are the same lamp with different packaging types (1-pack, 2-pack, 3-pack). When workers pick up a lamp and put it into the

color box, they will need to look at the ES model number printed on the lamp first. If the printed ES model is 13W/MS/27K/1, then the lamp goes into 1-pack color box. If the printed

ES model is 13W/MS/27K/2, then the lamp goes into the 2-pack color box. This will greatly slow down the packaging process and will be easy to be mixed up (for example, 13W/MS/27K/1 goes

into a 2-pack color box).

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

2. Lamp Labeling Requirements (lumen)

The draft requires that for lamps not covered by FTC requirements, a lamp's lumen be printed on the lamp. FTC requirements only cover lamps in E26 base (medium base).

The new labeling requirement in the draft means that we will need to print lumen on lamps in GU10, GU5.3 and GU24 bases. As you know, MR16 lamps have GU10 base and GU5.3 base. MR16 lamps

have a very small base. There is **no** room at all on the base to print lumen. **Furthermore, for MR16 lamps, people usually state light intensity (cd) instead of lumen.**

Therefore, this new labeling requirement in the draft should be removed

Best Regards
Lu Huang
Joinluck

Dear Sir/Madam,

We have more comments as follows on the packaging requirements:

The draft requires that lamp packaging should display on the **front** panel "dimmable" or "non-dimmable".

We think that the **front** panel requirement should be changed to "any panel except the bottom panel". It should be changed to read as follows:

Lamp packaging should display on any panel except the bottom panel "dimmable" or "non-dimmable" or the like.

Our reasons are as follows:

1. For non-dimmable lamps, UL requires that we print on the lamp "DO NOT USE WITH DIMMERS". Therefore, people will see it on the lamp.
2. At present, most companies display "not for use with dimmers" on the side panel of the packaging in the CAUTION section.

As you know, people revised all their packagings this year when the FTC requirements went into effect on Jan.1, 2012. If the new packaging requirement

in the draft becomes effective, because it restricts "non-dimmable" or "not for use with dimmers" to be in the front panel of the packaging, then people

will have to change all their packagings again. This will be a very expensive and time consuming process for people. FYI, we have over 1,000 packagings, all private labels.

Therefore, the "front panel" restriction should be changed to "any panel except the bottom panel" of packaging

Best Regards
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Dear Sir/Madam,

We have more comments as follows:

1. CFL Run-up time

The draft requires that covered CFL lamps reach 100% stabilized light output in 90 seconds, and bare CFL lamps reach 100% stabilized light output in 60 seconds.

The run-up time requirement is too high. Technically, some lamps will not be able to meet the new requirement. The new requirement is higher than the current European run-up time requirement and future European run-up time requirement. Below are the current European run-up time requirement and future European run-up time requirement:

Current European run-up time requirement: Covered lamps reach 60% stabilized light output in 120 seconds; Bare lamps reach 60% stabilized light output in 60 seconds.

Future European run-up time requirement (effective Sept.1, 2013): Covered lamps reach 60% stabilized light output in 100 seconds; Bare lamps reach 60% stabilized light output in 40 seconds.

We think that the new CFL run-up time requirement should be revised to be the same as the European requirement which makes sense technically.

2. Rapid cycle stress requirement for CFL

The new requirement requires that lamps survive cycling once per hour of rated life.

LED lamps have no problem meeting the new rapid cycle stress requirement.

For CFL with 10,000-hour life, the new requirement means that lamps should survive 10,000 cycles. For CFL lamps with lower wattages such as the most popular mini spiral 13W lamps, to meet the new requirement, manufacturers will have to add a component called "PTC (a thermal resistor) to the ballast.

The addition of the PTC will increase the lamp cost. In addition, PTC consumes electricity. This will result in lamps having a lower lumen per watt (efficacy).

Furthermore, with PTC, lamps will not start instantly when being switched on. Lamps will start after about 600 milli-seconds after being switched on. This is called pre-heat start. Consumers will not like this feature. Without PTC, lamps will start instantly after being switched on. This is so called "instant-on" or "instant start" which is a feature consumers like.

Finally, with the addition of PTC, manufacturers will need to change the filament type from filaments with low resistance values to filaments with high resistance values.

Filaments with high resistance values will consume more electricity than filaments with low resistance values. This will further reduce a lamp's lumen per watt (efficacy).

Therefore, we suggest that for all CFL lamps (or CFL lamps with wattages less than 18W), the requirement be revised to "lamps survive cycling once **per two hours** of rated life.

3. GU24 lamps

At present, GU24 lamps are covered under "Luminaire Specification" and "CFL Specification / LED Lamp Specification/ upcoming Lamp Specifications". This results in GU24 lamps having to be tested twice under "Luminaire Specification" and upcoming Lamp Specification, respectively. Could Energy Star only makes one standard for GU24 lamps to reduce manufacturers'

testing burden ? In addition, "Luminaire Specification" and upcoming Lamp Specification have different requirements on packagings. This means people have to have two different sets of

packagings for GU24 lamps. This does not make sense

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Dear Sir/Madam,

We have more comments as follows:

1. Power factor

The power factor requirement in the current ES CFL Specs is greater than 0.5. The vast majority of CFL lamps on the market have

a power factor between 0.5 and 0.6. And CFL lamps are used for both residential and commercial applications.

The power factor requirement from the current ES LED Lamp Specs is greater than 0.70. Most LED lamps on the market have

a power factor greater than 0.7 but less than 0.90. And LED lamps are used for both residential and commercial applications.

The draft Lamp Specs require that power factor should be greater than 0.90 if marketed as commercial grade. Most lamps can be used

for **both** residential and commercial applications such as "R", "BR", PAR, and "A-type" lamps. In order for a lamp to be sold for both

residential and commercial applications, manufacturers will have to revise the design of a lamp's circuit in order to bring power factor

above 0.90, then submit the revised design for UL re-test, FCC re-test and ES testing. This will be a expensive and time-consuming

process.

Therefore, we think that the requirement in the draft that power factor be greater than 0.90 if marketed as commercial grade **be**

removed

2. $R9 > 0$ requirement.

This new requirement in the draft will increase lamps' cost and it will not benefit consumers much. Most people will be notice the

difference between $R9 > 0$ and $R9 < 0$

Therefore, we think that the requirement in the draft of $R9 > 0$ should be removed

Best Regards

Lu Huang

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