

Dear Energy Star Lamp Team,

Thank you for providing us with the opportunity to make comments on the Final draft of Lamp v 1.0. We recognize EPA's long time effort on developing new Specification for Lamp. After reviewing the Final draft, LGE respectfully submit our comments as follows :

◆ **Product Variation**

Most of LED Package manufacturers achieve CCT variations by altering the composition of phosphor while maintaining the phosphor material. Changing the composition does not affect lumen maintenance. Thus, CCT variations would not make any difference in lumen maintenance of LED lamps. In the Final Draft, Lumen maintenance test for CCT variations has been omitted, however, manufacturers should still conduct Color maintenance test for a long time period. Looking at the data which LGE sent last June, the color shift between 0hr and 6000hrs is negligible. If the Color Maintenance test is omitted for CCT variations, there would be a reduction in testing burden with reduced sample size and time.

Therefore, LGE suggests to conduct the Color Maintenance Test only for the lamp with the lowest CCT.

Thank you in advance for your considerations of our comments.

Best regards,

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