

Dear Baker,

Good day and wish you and your family will have a good weekend.

I am Vick Zhang from Xiamen Leedarson lighting and responsible for certification work. After reading carefully the attached Draft, we make our summaries as the following:

Page 8: We think the efficacy requirement for omnidirectional lamp should be classified as covered lamp and no-covered lamps (spiral lamps and stick lamps). Generally speaking, the efficacy of covered lamps are lower 4~8 lumens per wattage than no-covered lamps, so we suggest the value of covered lamp should be adjusted as following:

Omnidirectional (covered lamp): Power < 10: ≥ 50 lm/W ; Power ≥ 10 : ≥ 55 lm/W

Page 11: Maybe it will be more reasonable to change Passing Test specified in Testing Guidance for Compact Fluorescent as following:

≥ 8 (the requirement 9 units is too strict, so we suggest change to 8) units shall fall within the defined 5-step (In UK and Australia, the value of SDCM is ≤ 5 , so we suggest change to 5) ANSI MacAdam ellipse for the target color temperature. No units shall fall outside of 7-step ANSI MacAdam ellipse.

Page 20: We also think the power factor ≥ 0.7 is too high. It specifies that PF ≥ 0.55 if $P < 25W$ and PF ≥ 0.90 if $P \geq 25W$ in Erp directive for lamp (244/95/EC) in Stage5, and the Australia standard Meps specifies the same value as well, so we strongly advise to modify this value from 0.7 to 0.55 if the power $< 25W$.

Page 22: Lamp shall achieve full stabilized light output in ≤ 90 seconds. As you know , it needs more time to achieve stabilized light output since its construction, so we think it is better if it allow the value is 180 seconds.

We hope you will take account of suggestion I raised above. Please advise us if there is any changes of Draft.

Thanks and Best Regards,
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