

Howdy,
Here are my comments for Lamps V1.0

9.2 Light Output

It is unclear why a manufacturer should be allowed to multiply EACH unit's luminous flux measurement by 1.03 if the average of all measured lamps without the tolerance fails to meet the requirement. Why would they be allowed to add this tolerance to lamps that already meet the requirement? We propose the manufacturer only be allowed to inflate the luminous flux performance of those specific lamps that are below the minimal requirement. This would reduce the overall lm/W inflation.

10. Lumen Maintenance and Rated Life

The Solid-State portion of this seems to go oddly back and forth between using straight luminous flux measurements of the integral lamp to create lumen maintenance percentages and using LM-80 data and/or TM-21 to make life time assertions. The first table uses 91.8% from the integral lamp as the minimum lumen maintenance for the standard 25,000 hour projection. The second table (for 3000 hour Early Interim Certification) using "a lumen maintenance projection" - this implies TM-21, it does not appear to require it, and a table is provided that requires minimum lumen maintenance data. The current SSL Integral Lamp V1.4 uses actual LM-80 data for this section. This is very confusing. We have already had customers trying to use these tables with LM-80 data - aiming for 91.8% +/-3%.

To add to the muddle there is an assertion that measurement error occurs in long-term testing, but doesn't occur at 0-hour measurement. I can't imagine why a sphere measurement would be correct at 0 hour but incorrect at 3000 hours or 6000 hours, especially since those measurements are usually done by the same people using the same equipment.

The 3% tolerance that is allowed because of this unexplained measurement error is applied to luminous flux measurements. Again, customers are trying to apply the 3% to LM-80 data - since the text does not specify that the 3% applies to lumen maintenance of the integral lamp.

Additionally it appears that if my integral lamp were testing out at 91.7% I could claim it as 94.5%. This would imply that my product would last 35,000 hours rather than 25,000 hours. I can imagine manufacturers near the 91.8% deciding to reduce their claim below 91.8% so they could add 3% to look better. We propose that if a product has the need to add up to 3% "tolerance" that they only be able to claim the minimum lumen maintenance they are aiming to achieve. So, if a product were running at 90% they only be able to claim 91.8%. The same with 91.7% - the claim would only be 91.8%.

Thanks,
Heidi

Orb Optronix