

Comments on Energy Star Lamps V1.0 (Draft2)

① Power Factor Requirements : All Lamps > 5 Watts

Solid State : ≥ 0.9 if marketed as commercial grade.

- To meet the requirement of 0.9 power factor (for > 5 W, commercial grade), it is needed to redesign the electric circuits (e.g. for additional capacitors and resistors).

Yet, MR 16 has very limited space so that it is extremely difficult to add circuits without expanding MOL.

Also, in doing so, it is assumed that the cost would be increased more than 30%.

- Suggest to allow increased maximum overall length values.

Still, however, the higher cost can be a big disadvantage for customers.

② Rapid Cycle Stress Test : All Lamps

- 5 minutes on/ 5 minutes off seems to be long without the need.

Per IEC 62612, for example, lamps are required to survive cycling at 30 seconds on, 30 seconds off.

- Suggest to align with the IEC requirement (30 seconds on/ 30 seconds off).

③ Lumen Output Requirements

- It is understandable that the new minimum light output for directional is intended to ensure that light output

from certified reflector lamps is consistent with the DOE rules which has become effective July 12,2012.

Yet, compared to omnidirectional lamp's lumens(e.g. 800 lumen for 60W), it seems to be too much upgrade at a time(e.g. 1,010 lumens for R20 65W).

In the integral LED lamps V1.4, "directional lamp shall have minimum light output equal to the target wattage

of the standard incandescent lamp to be replaced multiplied by 10".

For example, min. 650 lumens for a directional 65W lamp vs. min. 800 lumens for a omnidirectional 60W lamp.

- Need additional rationale

In terms of total luminous flux, isn't it natural that omnidirectional lamps such as A would have more lumens than directional lamps?

It is just because directional lamps use reflectors so that they would lose some lumens anyhow.

The rationale is needed to be clarified here.

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