

Dear Ms. Jantz-Sell,

The Sang Ji Scientific Co.,Ltd. appreciates the opportunity to comment on "Energy Star Lamps V1.0 Draft 4",

There is a specification of flicker for dimmable lamps but non-dimmable lamps at Draft 4. Sang Ji's comment is ;

### 11.3. Frequency: All Lamps

Lamp Type	ENERGY STAR Requirements	Methods of Measurement and/or Reference Documents	Supplemental Testing Guidance
Compact Fluorescent	Lamp light output shall have a frequency within 20 to 33kHz, or $\geq 40\text{kHz}$ .	None	<b>Sample Size:</b> One unit per model.  Lamp light output waveform shall be measured with a photodetector, transimpedance amplifier and oscilloscope. Employed equipment models and method of measurement shall be documented. Temporal response, amplification and filtering characteristics of the system shall be suitably designed to capture the photometric waveform.  Digitized photometric waveform data and an image of the relative photometric amplitude waveform and frequency shall be reported.  For purposes of third-party certification documentation shall not be reviewed when products are certified or during verification testing.
Solid-State	Lamp light output shall have an frequency $\geq 120\text{Hz}$ .  <b>Flicker index <math>&lt; 0.12</math></b> <b>Percent flicker <math>&lt; 20\%</math></b>		

Best Regards,

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