

Dear Sir,

**Subject:** Comment for the change of "10.1. Lumen Maintenance: CFL Lamps"

**Comment:** "The average lumen maintenance of the  $\geq 9$  surviving units shall meet the minimum requirement for the designated life claim." inside the Supplement Testing Guidance of 10.1.Lumaintenance: CFL Lamps In ENERGY STAR Draft 3. should be modified. Due to it against a commonsense.

For examples:

If there are 8 units out of 10 tested units with 81% lumen maintenance, 1 with 76 % and 1 with 75%, the average will be 79.9% and then fail the test, due to the average counted by 10.

If there are 8 units out of 10 tested units with 81% lumen maintenance, 1 with 76 % and 1 fail, the average will become 80.4% and pass the test, due to the average counted by 9.

It caused by "The fail one don't take into account, but the survive one take into account". So the definition should be modified to prevent the unreasonable result.

Please post this comment.

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