

Good Afternoon,

Our Lighting engineering team has been reviewing and discussing some of the latest specification releases. There was a concern that we wanted to share, and we wanted to present a potential resolution for you to consider.

We are concerned that the strict wording in Luminaires 1.1, Integral Lamps 1.4, and the proposed Lamps 1.0, may cause some lamps that otherwise should pass this requirement to be excluded. When measuring the optical waveforms of products that operate at DC, the more sensitive equipment will eventually only measure noise. Since this noise is usually 60Hz noise from nearby electrical circuits, it can cause the product to fail. In addition, the strictest interpretation of the standard excludes DC sources (frequency of 0 Hz) which, by definition, have no flicker.

We propose that a peak-to-peak tolerance of 5% of the DC component of the optical waveform be added to the requirement. Waveforms that exceed this 5% peak-to-peak tolerance will be subject to the \geq 120Hz existing requirement while waveforms that are within the tolerance do not need to meet any frequency requirement. This will also provide a path for DC sources to meet the requirement.

Thank you for your consideration, we look forward to your feedback.

Best Regards,

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