

From: Eric Choi [mailto:ec@bulbrite.com]
Sent: Monday, February 09, 2009 2:37 PM
To: Karney, Richard
Subject: Energy Star for LED Lamps - Bulbrite Comments

Mr. Karney -

Bulbrite has taken an opportunity to read over the first draft of the Energy Star Program Requirements for Integral LED Lamps and we would like to submit a few comments.

Dimming - Bulbrite believes that it is too early to include dimming as one of the requirements for LED replacement lamps. We understand that to truly replace an incandescent lamp, the replacement lamp must be capable of dimming. However, the dimmability of LED products is a function that has yet to be perfected. As mentioned in the cover letter of the first draft, the one of the major issues with dimmable LEDs is dimmer compatibility. Many dimmable LEDs work well with certain dimmers, however there is no guarantee that the LED lamp will work well in every installation. The second major issue with dimmable LEDs is the shortage in life hours. Many LED lamps will have shortened life hours due to the stress on the driver caused by dimming. Therefore, many LED lamps when dimmed may not meet the requirement of L_{70} at 25,000 hours. With these issues of compatibility and life hours, a method of standardization for testing dimming would be extremely difficult.

Although Bulbrite does believe that LED lamps should be dimmable, we believe that until the technology is perfected and LED-compatible dimmers are brought to market, dimmability should not be a requirement for Energy Star approval.

Color Temperatures - Currently the only color temperatures available for Energy Star approval are 2700K, 3000K, and 3500K. Bulbrite believes that higher color temperatures like 4100K, 5000K, and 6500K should be included. Due to its long life, energy savings, and low maintenance, LED replacement lamps are ideal for commercial use. Many commercial applications require higher color temperatures. For example, the most common color temperature for an office would be 4100K. However, under the new Energy Star requirements, products that are 4100K would not be Energy Star approved. Bulbrite believes that due the high demand for LED products in commercial applications, high Kelvin temperature LED products should be included.

Bulbrite hopes that our comments will help the DOE revise the first draft of the Energy Star Program Requirements for Integral LED Lamps. Thank you.

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