

---

**From:** Brian Halliwell [mailto:BHALLIWELL@lightsofamerica.com]

**Sent:** Friday, June 26, 2009 2:52 PM

**To:** richard.karney@ee.doe.gov

**Cc:** SSL; Mohammed Razzak

**Subject:** Additional Comment: ENERGY STAR criteria for integral LED lamps - Comments on Draft #2

Dear Richard,

There is one (1) additional question/comment we would like added regarding the Energy Star draft specification for integral LED replacement lamps.

Page 6 - For PAR and MR 16 Lamps Only

Minimum Center BEam Intensity

Question:

Having had conversations with one of the independent labs that conduct LM-79 testing, neither of us fully understand the actual specification and purpose of the minimum center beam intensity. It appears that the objective is to mimic the spectral distribution center beam intensity of a specific incandescent PAR or MR 16 lamp but if that is the intention, this requirement would create market barriers relative to design flexibility of the integral lamp relative to the use of multiple LED's and secondary optics. Given existing incandescent Par and MR 16 in the retail market place have a variety of stated beam angles, it would seem appropriate and acceptable to provide both the overall beam angle and maximum center beam intensity of the LED integral replacement lamp on the package without having to mimic the exact center beam intensity of a specific incandescent lamp being targeted for replacement.

Would it be possible to obtain a clear explanation on this requirement and the actual purpose?

Thank you

Best Regards,

Brian Halliwell