

Gong He Town, He Shan City, Guang Dong, P.R.C. 529728

Phone: (86) 750-8300941 (6 lines)

E-mail: petertao@neo-neon.com

Fax: 86-750-8300940

Website: <http://www.neo-neon.com>

(Notice: If you fail to get through, please fax to our Hong Kong Office with Fax No: 852-2786-2479, they will transfer it to us immediately.)

Dear Mr. Richard karney,

I am glad that there are the following changes for “**Omnidirectional lamps**” in the draft 2:

1) Luminous intensity distribution—

Draft 1: Products shall have an even distribution of luminous intensity within the 0° to 150° zone (axially symmetrical). Luminous intensity at any angle within this zone shall not differ from the mean luminous intensity for the entire 0° to 150° zone by more than 10%.

Draft 2: Products shall have an even distribution of luminous intensity within the 0° to 135° zone (axially symmetrical). Luminous intensity at any angle within this zone shall not differ from the mean luminous intensity for the entire 0° to 135° zone by more than 20%.

2) Maximum lamp diameter—

Draft 1: *Equal to target lamp diameter.*

Draft 2: *Not to exceed target lamp diameter.*

My comments are still concerned with the same points:

Point 1—Luminous intensity distribution for “Omni-directional lamps”:

About the requirement, I found the draft 2 is very close to the European Commission Regulation (EC) No 244/2009, however, there is still a little difference.

Attached the definition of EC No 244/2009: ‘**Directional lamp**’ means a lamp having at least 80 % light output within a solid angle of π sr (corresponding to a **cone with angle of 120°**); ‘**Non-directional lamp**’ means a lamp that is not a directional lamp;

IESNA TM-15 also has the alike lighting classification system by total lumen, not a even distribution of luminous intensity, the latter in the draft 2 is stricter and more limit to LED lamp.

Kindly note that the EC No 244/2009 has entered into force since April 2009, It is sure that the EC No. 244/2009 will make great influence to the LED lamp industry.

Therefore, I suggest that the draft 2 should apply the same definition about Omni-directional lamps, as a harmonization standard will be a great support to the worldwide LED industry and consumption.

Point 2—Maximum lamp diameter for “Omni-directional lamps”:

I suggest to cancel the requirement, that is the reason that the requirement “Maximum lamp diameter” has been covered in “Maximum overall length (MOL)” for different target lamp type, and there is no specified or rated diameter for a lamp type except the MOL as per ANSI C78.20-2003.

Thanks for your kind attention.

Peter Tao

Testing Center / Manager

&

Hector Wang

Ph. D

VP of Sales and Marketing