

Neo-Neon LED Lighting International Ltd.

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 to continue my comment to the draft 2 as follows:

An integral LED lamp is commonly made of LED array, if without further diffusing envelop design, will necessarily create uneven "**Luminous intensity distribution**"; If with further diffusing envelop design, an integral LED lamp maybe comply with the requirement-- even "**Luminous intensity distribution**", but it must be a "non-clear lamp" like a CFL .

If using such "non-clear" CFL or integral LED lamp to phase out "clear" incandescent lamp, it will be not perfect,because a "clear" lighting effect is still needed from consumer's perspective;

In order to look like a clear incandescent lamp, an integral LED lamp must use a clear envelop design,and may be equipped with some special optical design for LED lighting source, please refer to the below figure. Acutually,It will be difficult to meet both consumer's expectation and the even "**Luminous intensity distribution**."

So,from our point of view, an **even illumination distribution** within an area or cone shall be an **alternative solution** to this problem.

On the other hand, **illumination uniformity** is also a conventional check for general lighting service,not a even "**Luminous intensity distribution**".

Thanks for your kind attention.

Peter Tao

Testing Center / Manager

&

Hector Wang

Ph. D

VP of Sales and Marketing

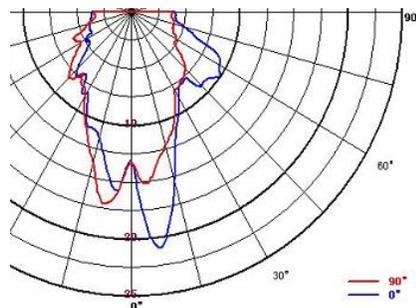


Figure.--A "Clear" Integral LED Lamp has special optical design like incandescent lamp,but has an uneven "**Luminous intensity distribution**".