From: Randy Abernathy
To: lamps@energystar.gov;
Subject: Lamps Draft 1 specification comments
Date: Tuesday, December 06, 2011 10:40:02 AM
Attachments: ENERGY_STAR_Lamps_V1_0_Draft_1.pdf
ENERGY STAR Lamps V1_0_Cover_Letter.pdf

Thank you for giving ACS the opportunity to be a part of the Lamps specification development process. I have a couple of comments on the Draft 1 specification.

"Transient Protection" comment:
On page 23 in the "Transient Protection Requirements: All Lamps" section the following statement is in the "ENERGY STAR Requirements" Column:
"Lamp shall survive 7 strikes of a 100 kHz ring wave, 2.5 kV level, for both common mode and differential mode."

The base types covered by the LAMPS specification do not have a connection to the grounding conductor, only Line and Neutral, therefore Common Mode is not applicable to products covered by this specification.
Suggest removing the words "for both common mode and differential mode" from the Lamps specification requirement. The relevant modes to test are defined in the ANSI/IEEE standard.

"Color Spectrum Educational Tool" comment:
The current "color spectrum educational tool" as shown on page 28 of the Draft 1 specification does not indicate where an incandescent lamp falls on the diagram. The Lighting Facts label also lacks this indicator. From discussions I have had with consumers, they do not know what color temperature to select to get a similar color to their currently installed incandescent lamps. The tool is not helping them in that respect. If this color diagram is going to be used on packaging I would suggest to include an indicator of where incandescent lamps fall on the diagram.

Thank you again for giving us the opportunity to comment on the Draft 1 version of the ENERGY STAR for Lamps specification. Please feel free to contact me if you have any questions or comments about these suggestions.

Best Regards,
Randy

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