

Energy Star SSL Luminaire Draft 2 Comments

External v. Internal Power Supply- There needs to be a clear definition of both external and internal power supplies. They both need to be listed in the definitions. External Power Supplies would be in an enclosed package, that is located exterior to the luminaire body, with an AC premise wired power source and outputs an isolated DC power source for the operation of a luminaire. The Internal Power Supply would be self-contained inside the body of a luminaire without an enclosed package. We recommend that the specification of an external power supply (EPS) listed in the exceptions include a power supply that is “internal” to a luminaire. They should both be treated identical and clarification is needed here.

What is meant by modulation depth? The definition of the modulation depth must be clarified. Is the notation “modulation depth must be $< 50\%$ ” correct? Should it be “ $> 50\%$ ”? A clearer definition and a consistent standard requirement would define the required duty cycle of the signal rather than the depth of modulation. Further discussion and clarification on this subject needs to be accomplished and addressed with a focus on photo-biological safety standards. Our initial experimentation has shown that the frequency may not be as important as is the ON time versus the OFF time within the duty cycle. We recommend further study be funded in order to ensure that any future innovation is not arbitrarily excluded.

Dimming Compatibility on packaging- It seems improbable to list all currently known issues on the package when there is a time lag in discovery, package changes, and shelf time. Why not refine the requirement to list the known major issues with a referring web address for a complete and current list?

Non-directional Luminaires- a review of traditional lighting products, such as table lamps, reveals that not all table lamps are meant for task lighting. The minimum 800 lumens assumption seems unrealistic and arbitrarily adopted from the integral LED lamp requirements. Prescribing a minimum of 800 lumens leaves the consumer with little or no Energy Star approved option for smaller, “mood-creating” table luminaires. It would seem difficult to convince consumers that they really want an 800 lumen table lamp on their night stand. Is it possible to further define the category into “large, task table lamps & small, ambience table lamps, etc.”?