

Dear Mr. Baker, Stakeholders, et al,

Seoul Semiconductor, Inc. wishes to comment on the recent Department of Energy proposed Energy Star Program Requirements, Eligibility Criteria, "Energy Star Luminaires V1\_0 Draft\_2\_Final2", in particular with regards to the flicker section and specifically the appearance of the modulation depth value of 50%.

There is no data given to suggest this modulation depth (50%) has impact on human vision at frequencies above 90Hz. The 1961 study done by D.H. Kelly notes that most human perception does not go beyond 90Hz at 100% modulation with a sinusoidal waveform over multiple fields of vision. This study was further referenced by the book "Human Factors in Lighting" written by Dr. Peter Boyce.

It is our strongest recommendation this be removed entirely from the specification until further study proves this to be requisite.

Regards,

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