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Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the Lamps V1.0 Draft 3 specification. We appreciate all the study and hard work that has gone into this specification. Please refer to the below comments and section numbers for review:

Section No.

- 1. **Scope and Lamp Classification:** As a third party testing laboratory we receive a lot of inquiries monthly about “residential or light commercial” type of replacement lamps at higher wattages around 85W for CFL and 50W for LED with mogul bases that may be used in residential yard light poles or by hanging off garages or barns. Given the DLC restrictions on screwbase lamps there currently is no program for these products that the partners can benefit from. Intertek would like to ask that a category for this type of product be included in the Lamps V1.0 specification as soon as possible.
- 4. **Definition section:** Please add in a definition for “Instant Start” CFLs. In the past there was clearly a movement to “amalgam” technology when the requirements were lowered for Run Up time leaving an exemption for “amalgam” technology. This category should be clearly defined to limit improper claims.
- 7. Thank you for the additional testing explanations and clear allowable variations within the family grouping section, part 7.
- 9.5 **Luminous Intensity of Omnidirectional and Decorative LED lamps:** a recent quick review of the distribution of several aline, candle, and globe shaped incandescents show that the restrictions regarding 20% limits from the average candela in the 0-135 zone is not consistently met on these baseline types. Intertek would request this restriction be raised to 30% to stimulate growth in these product areas.

Elevated
Temperature
Life Test
Addendum

Option C – lampholder spacing: LM-65 does not regulate spacing around lamps, rather, life test racks are required to be designed to allow air flow around each lamp or fixture. Intertek supports the minimum spacing of 2” between lamps and a minimum of four temperature points in the life test area for ease of laboratory correlation. However, the spacing requirements of 6-12” between the center of sockets greatly reduces the real estate available to test a large quantity of lamps when the ambient conditions are tightly controlled, causing unnecessary additional costs and time delays in life testing for the partners.

And

Ambient
Temperature
Life Test
Addendum

In addition, a width of 5 inches between sockets has not been used for CFL testing since 1999 at our laboratory, including CFL QA testing, with no adverse effects. Over 15,000 CFLs have been life tested this way.

Intertek requests that the minimum spacing between sockets for Option C Elevated and the regular ambient life test racks to be deleted from the life test methods with the other two items kept in to promote a balance for all.

Best regards,

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