

Dear Sir/Madam,

Our comments are as follows on the Lamp Labeling Requirements (ES model number or SKU number):

The draft requires that lamp model number or retail SKU number be printed on the **lamp** as it appears on the ES Qualified product list.

The current ES CFL and LED Lamp specs do **not** require that a lamp's ES model number or retail SKU number be printed on the lamp as it appears on the ES Qualified product list.

The current ES CFL and LED Lamp specs require that a lamp's ES model number or retail SKU number be printed on the **packaging** as it appears on the ES Qualified product list.

We think that this new labeling requirement in the draft should be removed for the following reasons:

As per UL requirements, a product's UL model needs to be printed on the lamp. Since color temperatures and packaging types do not affect product safety, a product's UL model usually does not show color temperatures and packaging types. For example, the UL model of CFL mini spiral 13W is 13W/MS. 13W/MS needs to be printed on the lamp and it can represent any color temperature and packaging type such as 1-pack (a color box holds one lamp), 2-pack (a color box holds two lamps), 3-packs, and etc.

If it is a 2700K lamp, we print 13W/MS 2700K on the lamp. Here 2700K is not part of the UL model. And the packaging can be 1-pack, 2-pack, 3-pack, and etc.

A product's Energy Star model number usually shows color temperature and packaging type. For example, if it is CFL mini spiral 13W 2700K 1-pack, the product's ES model number is 13W/MS/27K/1. If it is CFL mini spiral 13W 2700K 2-pack, the product's ES model is 13W/MS/27K/2. If it is CFL mini spiral 13W 4100K 3-pack, the product's ES model number is 13W/MS/41K/3.

Therefore, if the new labeling requirement in the draft becomes effective, then we will need to print both UL model and ES model on the lamp. Both models look similar, but not the same. It will create confusion.

In addition, supposed that we have an order to produce CFL mini spiral 2700K in 1-pack, 2-pack, and 3-pack at the same time. They are the same lamp with different packaging types (1-pack, 2-pack, 3-pack). When workers pick up a lamp and before putting it into the color box, they will need to look at the ES model number printed on the lamp first. If the printed ES model is 13W/MS/27K/1, then the lamp goes into 1-pack color box. If the printed ES model is 13W/MS/27K/2, then the lamp goes into the 2-pack color box. This will greatly slow down the packaging process and will be easy to get mixed up (for example, 13W/MS/27K/1 goes into a 2-pack color box by mistake).

Furthermore, some private labelers do not use model numbers, they use retail SKU numbers which differ for the same lamp with different packaging types. For example, if it is mini

spiral 13W 2700K 1-pack, the SKU number is 45601. If it is mini spiral 13W 2700K 2-pack, the SKU number is 37602.

Then we will need to print both UL model (13W/MS) and SKU number (for example, 45601) on the lamp.

Supposed that we have an order to produce CFL mini spiral 2700K in 1-pack and 2-pack at the same time. They are the same lamp with different packaging types (1-pack, 2-pack,). When workers pick up a lamp and before putting it into the color box, they will need to look at the ES SKU number printed on the lamp first. If the printed ES SKU number is 45601, then the lamp goes into 1-pack color box. If the printed ES SKU number is 37602, then the lamp goes into the 2-pack color box. This will greatly slow down the packaging process and will be easy to get mixed up (for example, 45601 goes into a 2-pack color box by mistake).

Finally, a lamp's base has limited space and does not have enough room to print two models (UL model and ES model, or UL model and ES SKU number).

Therefore, this new labeling requirement in the draft should be **removed**. A product's ES model number or retail SKU number should only appear on the **packaging** as specified in the current ES CFL and LED Lamp Specs.

Best Regards  
Lu Huang  
Joinluck

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Dear Sir/Madam,

Further to our comments below, we have more comments on the effective date of the new ES Lamp Specs.

The new ES Lamp Specs will come into effect 275 days from its publication date. 275 days are not long enough for manufacturers.

When the new Lamp Specs is published, lamps which are currently ES qualified will need to be re-tested against the new specs.

We have close to 100 models which are currently ES qualified. It will take us quite some time to prepare test samples for all these models. In addition, testing itself will take 5 to 7 months (150 days to 210 days). Then it will take CB quite some time to review our submissions.

Finally, since all the manufacturers will need to send samples for re-test, test labs may not have enough resources to test all the lamps during the period.

Therefore, we think that the new ES Lamp Specs should come into effect **18 months** from its publication date. When UL changes its standards, UL gives people two years to prepare for the change

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