

Dear Sir/Madam,

Below are our comments on the draft 1 of the Lamp Specification:

1. The draft specs proposes power factor for CFL to be increased to 0.70. This will require circuit changes. Then all the lamps will have to be re-tested by UL and FCC in addition to ES re-test. This will be a very costly exercise and time consuming.

2. The current ES CFL specs only requires reflector lamps to be tested in elevated temperature environment (all lamps should be tested in base-up position). The draft specs requires that all lamps including bare lamps to be tested in elevated temperature environment (five lamps to be tested in base-up position, five base-down).

In addition, under the current ES CFL specs on rapid cycle stress test, one cycle is equal to two hours of life. This means that 10,000-hour lamps need to be tested for 5,000 cycles. The draft proposes that one cycle be equal to one hour of life. This means that 10,000-hour lamps need to be tested for 10,000 cycles.

These are major changes from the current ES CFL specs. This means that factories will need to send all their ES-listed lamps for complete re-test.

This will be a very costly exercise and time consuming.

The major changes will force people to retire many of their ES listings on specialty lamps. The changes will discourage people to have more ES listings.

3. The draft specs have some new requirements on artwork and lamp labelling. For example, the draft requires a color spectrum to appear on the front panel of the artwork. The color spectrum specified in the draft is different than the color spectrum in the Lighting Facts Label. The draft also requires all artworks to show "dimmable" or "not dimmable" on the front panel of the artwork.

In addition, the draft says that the ES qualified model number should be different than the earlier non-qualified version of product already introduced to the market. This will cause trouble to people and is not necessary. Whenever people have a lamp qualified for ES, they have to use a new model number and then have to change the model number on their catalogue and selling materials. People will have more SKU's/items in their warehouse as a result. This is costly and troublesome. The earlier non-qualified version of product does not have the ES logo on the packaging. Consumers will not confuse ES qualified lamps with NON-ES qualified lamps

The draft requires that the front panel of the packaging indicates "dimmable" or "not dimmable". Usually, people say "Not for use with dimmers" or "Do not use with dimmers" on the side panel together with other cautionary wordings. It is not necessary to specify the front panel location.

The draft requires the following lamp labelings: "phone number for question or complaint resolution", "dimmable" or "not dimmable", "contains mercury", and "lamp model".

The phone number for question or complaint resolution should appear on the packaging. The lamp base is too small to have so much information printed on it.

If the lamp is not dimmable, UL requires the marking "DO NOT USE WITH DIMMERS". This is sufficient and there is no need for the labeling "not dimmable" as specified in the draft. If a lamp is dimmable, then the lamp can be used either as a dimmable lamp or as a non-dimmable lamp. Therefore, it is not necessary to have the labeling "dimmable".

As per FTC requirement, mercury symbol Hg and the phrase "Mercury disposal: epa.gov/cfl" are marked on the lamp. Therefore, it is not necessary to have the labeling "contains mercury" as specified in the draft. The lamp base is too small to have so much information printed on it.

UL requires that lamp model be printed on the lamp. Therefore, it is not necessary for the draft to specify that lamp model be labeled on the lamp. UL model number may be different than the ES model number. UL model number is not related to packaging type. ES model number /SKU number is related to packaging type. The same lamp may have different ES model numbers due to different types of packagings. A lamp cannot have both UL model number and ES model number printed on the product because it will be confusing.

This year, people just changed all their artworks and base etchings to comply with the new FTC requirements. Other than the FTC requirements, ES specs should not have additional requirements on artwork and base etching. Otherwise, next year, people will have to change all their artworks and base etching again. This is a big exercise

4. The draft specs have different requirements on GU24 lamps than the ES Luminaire Specs. This means that GU24 lamps may need to be tested twice in order to comply with both specs. ES should have only one set of requirements on GU24 lamps

5. The draft specifies minimum starting temperature of -18C. It should be changed to minimum -15C as some covered CFL lamps may not start at -18C.

Best Regards

Lu Huang

Joinluck

Dear Sir/Madam,

Below are additional comments on the draft 1 of the Lamp Specification:

When ES CFL Specs were changed from version 1 to version 2, then to version 3, there were no re-testings required. When the ES CFL Spec was changed from version 3 to version 4, people only needed to send their lamps for a minor test (measurement of color coordinates X and Y) to remain ES qualified.

If the current draft ES Lamp Spec is finalized as is, then people will have to send all their currently ES qualified lamps for complete re-test (many test items including lumen maintenance and life testings). This will be very costly and time consuming for factories. In this case, factories may choose not to send their currently ES qualified speciality lamps for re-test (retire these ES lamps from ES program). As you know, the sales volume on specialty lamps are relatively small.

In addition, one reason people want to have ES is because ES qualification may enable people to obtain rebate on lamp sales. Usually rebate is given on major items, not specialty items. Therefore, it may not be necessary for specialty items to have ES. People may just retire specialty lamps from ES program to reduce testing cost.

The previous changes in the ES CFL specs did not require changes in artwork and lamp labeling. But the current draft Lamp Specs require changes to the artwork and lamp labeling. These are not very value-added things. But it will make people spend a lot of time and money on these changes

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