

Friday, January 14, 2011

Kichler Lighting comments - Final draft Version 1.0

- Page 13 - Kichler still feels that the 200lm/ft for residential cove applications is too high.
- Page 13 - Besides the fact that we already have optics tooled and in use from the DOE zonal spec, and will have to spend dollars re-tooling for a few degrees to ensure we meet the requirement in all cases, narrowing the zonal requirement makes it even more difficult to properly light up a decorative piece of glass which is very common to the category.
- Page 27 - Solid State dimming requirements are pretty vague. With no available standard, what exactly is required for submittal? Typical dimming switches vary greatly, what will be specified as control samples? Does the luminaire only have to produce the range on one dimmer switch that satisfies the requirement, identify it and any "known" dimmers that do not?
- Page 36 & 37 - Driver case temperature as it relates to the over-all products L70 claims or requirements is very vague and provides no correlation between the  $TMP_d$  and the predicted life of the driver sub-components. Currently the  $TMP_d$  on any driver on the market typically relates only to the Safety value. In order to make this actually valid, data showing that every component on the driver is operating within parameters that result in whatever L70 is being claimed. The "Note:" inserted here does not get it done. All this work to control the LED operation, quality, and life, and the driver can quit in 6,000 hours.....?
- Page 36 & 37 - Also don't understand why the L70 verification of a driver should be different for directional vs. non-directional.
- Clarification of "Light Engine" definition is needed. Many opportunities for non-directional products are eliminated if the driver must be "integrated" physically with the LED array. Ex: indoor pendant w/driver located in decorative canopy. Is this intentional?
- Page 39 & 40 - Is there a reason that some of the other UL lighting stds are not listed (UL/ANSI 2108 for example)?
- Page 39 & 40 - For the driver requirements, is this stating that a driver sold as a listed, recognized, or certified component would only carry the UL/ANSI 8750 designation? Kichler has Drivers covered under [UL1310/C22.2 which is listed as acceptable in UL/ANSI 8750 \(clause 4.1\)](#).

Thanks,

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