

Email received on May 10, 2010 from Matthew Nuhfer.

**Background:**

In designing digitally addressable, universal line voltage (120-277) LED drivers and fluorescent ballasts, Lutron has learned that meeting the off-state power consumption of 0.5W at 277V in a wide range input voltage unit is extremely difficult. Sometimes an entire, dedicated switch mode power supply must be put into the product strictly for this requirement. This greatly increases the cost, size, and complexity of these products.

While we understand that reducing off-state power consumption is important, the current requirements set the bar extremely high for digitally addressable (or sensor containing), universal line voltage products. This means that other energy savings that these products could offer (daylight harvesting, vacancy sensing, load shedding, etc.) may not be realized.

**Comment regarding "Off-State Power Consumption Requirements" section on page 27:**

Exceptions should have *wattage requirements that are a function of line voltage*. For instance:

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For  $V_{in} \leq 120V$ :  $P_{in} \leq 0.5W$   
For  $V_{in} > 120V$ :  $P_{in} \leq 0.75W$

Products that can accept multiple input voltages should meet the requirements at all applicable line voltages.

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These values would scale accordingly for the 1.5W exception. Other methods for creating the limits could be employed such as a linear equation, etc.

Thanks,

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