

Email received on January 14, 2011 from Takehiko Saigo.

January 14, 2011

Mr. Alex Baker
Lighting Program Manager, ENERGY STAR
U.S. Environmental Protection Agency

Re: ENERGY STAR Luminaires Final Draft Version 1.0 Specification Comments

Dear Mr. Baker,

Stanley, we request consideration toward this submission as it relates to the proposed Luminaires Final Draft Version 1.0 Specification .

1. Solid State Option 1: LED Package, Module or Array Performance (Page 18)

- CCT sampling system

LM-80 Sample Size: minimum sample size of 25 units for LED packages, or 10 units for LED modules or arrays, for each TS and drive current combination.

Each sample set may be composed entirely of one target CCT, or may be split between no more than two adjacent target CCT values as outlined in ANSI C78.377 (e.g. 2700 and 3000K, or 3500K and 4000K).

< Our comment >

Regarding " target CCT ", this expression is abstract.

This is not clear which CCT should be chosen for the representative CCT from CCT variation of same type of LED package , module or array.

Stanley recommend the lowest CCT(the coolest CCT) is best representative CCT from variation of same type of LED package, module or array for LM-80 test.
(Ex. 2700k or 2750k sample X 25pcs)

2. Color Maintenance Requirements:
Solid State Indoor Luminaires Only (Page 23)

The change of chromaticity over the first 6,000 hours of luminaire operation shall be within 0.007 on the CIE 1976 (u',v') diagram, as demonstrated by either:

< Our comment >

Regarding " shall be within 0.007 on the CIE 1976 (u',v') diagram,"
in LM-80 test on more than 85°C temperature , within 0.007 after 6000 hours
operation, it is a severe demand by the current LED phosphor technology only for
some CCT value.

Please investigate current feasibility of within 0.007 on the CIE (u',v')
diagram after 6000 hours operation for existing white LED CCT range. (from 2700k
to 7500k)

We hope that EPA will strongly consider reviewing our comments with the industry
stakeholders involved in these activities.

Best regards

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Takehiko Saigo

STANLEY ELECTRIC. CO.,LTD

TOKYO HEAD OFFICE

Design Engineering Evaluation Sect.

Quality Assurance Dept.