1) Doc page 27: "The luminaire and its components shall provide continuous dimming from 100% to 50% of lamp power. Step dimming, if employed, shall provide at least two discrete light output levels ≥ 50% of total light output and not including 100% output."

Comment: (1)The first sentence seems to preclude the second. In other words If the luminaire has to provide continuous dimming, then how can it also provide step dimming? (2) There appears to be a contradiction in the percentages of the two sentences. The first refers to power; the second, to light output.

It should state:
"The luminaire and its components shall provide either continuous or step dimming from 100% to 50% of lamp power. Step dimming, if employed, shall provide at least one discrete lamp power level ≥50% not including 100% power."

2) Doc page 30: "120 to 400 Hz or ≥100 kHz"

Comment: I'm not sure where this came from. Magnetic ballasts are "50 or 60 Hz".
Electronic HID ballasts are either
a) ">60 Hz up to 400 Hz" (low frequency square wave types) per ANSI C82.14-2006 which is in the Reference Documents page 10 or
b) ">TBD kHz" (high frequency sine wave types). No ANSI standard exists but ">40 kHz" has been proposed in a CDC.

Also, there is an Electronic Ballast definition on page 5 which only defines a fluorescent ballast ("greater than 10 kHz (ANSI standard C82.13 2002)"). The definitions of HID electronic ballasts are in C82.9-2010 which is not in the list of Reference Documents.

3) Doc page 28: "Ballast or driver shall comply with ANSI/IEEE C62.41.1-2002 and ANSI/IEEE C62.41.2-2002, Category A operation. The line transient shall consist of seven strikes of a 100 kHz ring wave, 2.5 kV level, for both common mode and differential mode. "

Comment: This statement only refers to the surge testing of fluorescent ballasts. It is too poor of an IEEE location category for HID electronic ballasts which in this document are only for outdoor use, though ANSI C82.14-2006 does use this definition for low frequency square wave electronic ballasts for HID lamps. Active CDC's for HID electronic ballasts recommend IEEE Location Category C Low (6 kV) and High (10 kV) Exposures for outdoor area and roadway applications.

4) Doc page 33: "Ballast case temperature.....operation."

Comment: The requirement is only suitable for electronic ballasts such as fluorescent and some HID. The vast majority of HID ballasts are magnetic and are rated differently than by case temperature, e.g. separate component temperature limits for coils, capacitors and ignitors.

5) Doc page 36: "Demonstrate compliance with ANSI/UL 1029-2010."

Comment: For electronic HID ballasts, there is no single document. Instead, a combination of UL 1029 and UL 935 is used.

Regards,

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