From: Evan O'Sullivan [mailto:evan_osullivan@lednovation.com]
Sent: Friday, June 26, 2009 2:19 PM
To: Richard.Karney@ee.doe.gov; SSL
Subject: Energy Star Integral Lamp Specification -Comments from LEDnovation

Richard,

LEDnovation is pleased to submit the comments below for consideration in the authoring of the final Energy Star Integral LED Lamp specification. We were pleased with the changes that occurred between the first and second draft of the specification and have only a few comments on the second draft.

"Dimming" – Page one

We recommend an improved definition of "dimmer safe" to include a) a complete lamp failure or b) a noticeable degradation in performance after use on a dimming circuit.

"Incompatibility with Controls and Application Exceptions" - Page three

We recommend that you strike this entire requirement. UL already requires that lamps are marked for area of use (Indoor/Outdoor) and environment (Dry/Damp/ Wet). The dimming requirements on page one and page three already require manufacturers to state if the devices are not dimmable, or if they are dimmable the manufacturer is already being asked to maintain a list of compatible dimming devices on a website.

"Reliability" – Page seven

We recommend that reliability be completely stricken from the Integral LED Lamp Specification until such a time as the chosen methodologies and test conditions have been specified in detail.

Regards,

Evan

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