



**ISO 9001**  
quality assured

## Neo-Neon LED Lighting International Ltd.

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*(Notice: If you fail to get through, please fax to our Hong Kong Office with Fax No: 852-2786-2479, they will transfer it to us immediately.)*

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Dear Mr. Richard karney,

We,Neo-Neon appreciate the DOE' efforts and success relating to Draft # 3 **Integral LED Lamps Criteria**, We also appreciate the opportunity to comment on Draft #3:

### 1) Reference Standard

**Question:** "UL 1993 – 1999" on P5, & P28,

**Correction:** "UL 1993 -2009";

### 2) "Rapid Cycle stress Test" on P9, 11,12,14;

**Question:** "Laboratory Requirements DOE CALiPER Recognized or NVLAP Accredited for LM-79" on P 11,12,14,and blank on P9.

**Comment:** **LM-65** is for "Life test performance",**LM-79** is for "Photometric measurements", they are 2 different standards, so it is not suitable requiring LM-79 accredited Lab□

Up to now, no Lab is accredited LM-79 by NVLAP, and yet, no lab is recognized with LM-65 by DOE; If the criteria require LM-65 accredited Lab, obviously, it will obstruct the implementation in the coming year. Meanwhile, Energystar Eligibility Criteria for CFL is very looser regarding this point,

**Suggestion:** "Laboratory Requirements"—Self-certification Note: A laboratory test report must be submitted upon DOE request";

### 3) Correlated Color Temperature-

**Comment:** Now,CFL has been sucessfully and widely making 4500-6500 K acceptable. On the other hand, CCT should be selected by customer preference, the criteria shall not limit customer's selection and people's visual adaption shall be release from conventional lighting source.

**Suggestion:** We support GE's suggestion to allow all color bins specified in C78.377-2008 for all LED intergral lamps, especially for non-standard lamps, decorative lamps,and LED lamps intended for outdoor applications.

### 4) Interim qualification after 3000 hours-

**Comment:** Provisional approval --3000 hours at 45°C;

Full approval -- 6000 hours at operating temperature;

Ambient temperature (i.e. specified for operation Temp.) is 25 °C normally according to UL 1993 safety approval;

Provisional approval is very good solution to facilitate SSL energystar process,but manufacturer will hesitate to spend money and time on provisional approval because 2 different test temperatures create double cost.

**Suggestion:** Provisional approval 3000 hours at operating temperature; average lumen maintenanc ≥ ???%;



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### 5) Frosted Lamp and Clear lamp—

**Comment:** The criteria has a very higher luminous efficacy, at the same time, the criteria has not a requirement relating to visual discomfort glare evaluation, so LED Integral lamp supplier will tend to provide clear LED Integral lamps in order to meet the requirement of luminous efficacy, but lose the promotion of “non-Clear LED integral lamp” like CFL.

Comparably, European Commission Regulation (EC) 244/2009 differentiates “Clear lamp” and “non-Clear lamp” with different luminous efficacy;

In fact, Energystar Program Requirements for FLF, CFL have a lower luminous efficacy 10 lm/w for secondary optics or covered lamp (i.e. with diffused cover or Frosted lamp);

**Suggestion:** decrease the minimum luminous efficacy by **10 lm/w** for all “Non-Clear LED lamp” (or Frosted LED lamp, or diffused cover) alike the Energystar criteria of CFL, RLF;

Thanks for your kind attention.

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