

Email received on January 22, 2010 from Richard Reid.

I am concerned about the proposal to change the standard for Integral LED lamps.

The proposal to lower the minimum frequency has many valid points. My concern is more of a procedural one. If the standard is lowered with other limits on flicker then we may well see products that do not meet consumer expectations and generate a poor first impression. The very beginning of any innovation is extremely critical. Consumers will not notice if the standards are raised in a year or two, the damage will have been done.

The standard must prevent visible flicker. My thought is to raise the standard until it can be replaced. We know flicker is significantly detrimental and is a major measure of quality to consumers. If the research is not conclusive on flicker rates near 150hz then the standard should be high enough to avoid the uncertainty. I recommend going to 500hz or higher as an initial standard. If further information suggests that some other standard allows for lower frequency without flicker, then I would fully support change. Once poor products are on the market it is very difficult to remove them.

Thank you,

Richard Reid, LC
Silhouette Lights