

Dear Mr. Alex Baker:

We would like to appreciate this opportunity to comment on the draft 2 –Product specification for lamps (light bulbs).

First of all, we respects the efforts of EPA to conserve energy. Having examined the draft 2, however, we would like to raise the following issue and question.

1, As LED lamp different from CFL and incandescent lamps, can be driven by a range line voltage (100V-120V-240V),which provide a very good chance to harmonize the worldwide main technical standard, especially between US ES technical criteria and European IEC/EU technical requirement. No any one LED lamp supplier within Us, Europe or China, hope redesign different general lighting LED lamp E26/E27, MR16, Par series for different region, and hope design one product could meet the most important market Europe or US, maybe both Europe or US has a high or low different performance requirement and/or testing requirement, but they should not be conflict.

Such harmonization job would not be so different as thought. Please find the attached “COMMISSION REGULATION (EU) No .../. of ...implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for directional lamps, light emitting diode lamps and related equipment” and “IEC/PAS 62612 Self-ballasted LED-lamps for general lighting services –Performance requirements”, We hope more LED lighting stakeholders could pay attention to these European IEC/EU documents, EPA could give more time to more LED lighting stakeholders to input comment.

2, “Annex C: ENERGY STAR® Elevated Temperature Initial Light Output Ratio” is input from CFL specification, we think that new IES LM-82 should be adopted for for LED lamps herein.

3, We find a few little error: P1,repeat C62.41.2-2002:

Organization	Identifier	Description
ANSI/IEEE	<u>C62.41.2-2002</u>	IEEE Recommended Practice on Characterization of Surges in Low Voltage (1000V and Less) AC Power Circuits
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As above point 2, IES LM-82-12 “ IES Approved Method for the Characterization of LED Light Engines andLED Lamps for Electrical and Photometric Properties as a Function of Temperature” should listed in the reference document.

Please feel free to contact with us if you need us further action and research related to this criteria.

Thanks and best regards.

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