

Infinilux, Inc.

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Mr. Karney,

We are looking forward to the meeting on February 8th. Here are some initial thoughts for you.

It is our position that the current draft of the ENERGY STAR SSL specification creates a prejudicial arrangement favoring CFL technologies and does not acknowledge or certify benefits of the more efficient and longer lasting SSL technologies.

It is Infinilux's position that the current draft ENERGY STAR specification for SSL lighting is not practical with the current state-of-the-art, and a lowering of the power factor (PF) target of 0.9 and a raising of the efficiency target from 60% should be considered. With the current CFL specification targeting only a 0.5 power factor the gap between SSL and CFL is an impractical initial benchmark.

Infinilux believes that a first pass specification should target a PF of 0.70 and an efficiency of 70%, which would be a considerable improvement over the existing ENERGY STAR program requirements for CFLs. There are currently no existing products that meet these targets, but our R&D has determined that it is possible and will stimulate innovation in the SSL industry.

This change would still make the new SSL product the most efficient available and will provide an efficacy greater than 50 l/m per watt

Best regards,

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