## Comments on

## "Energy Star Program Requirements for Solid State Lighting Luminaires" Elgibility Criteria – Version 1.0

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- <u>Page 3: Color Spatial Uniformity:</u> The text reads that the chromaticity in different directions shall be within a 4-step ANSI MacAdam ellipse. The angular increments (both laterally and vertically) should be specified: ex: 45-degree lateral, 10-degree vertical. Also, it does not indicate what the variation shall be referenced against: ex: shall be within a 4-step ANSI MacAdam ellipse of the 0-degree reading (or within ... of the nominal CCT blackbody locus).
- <u>Page 3: Color Maintenance:</u> The text reads that the chromaticity shall be within a 4-step ANSI MacAdam ellipse, but it does not indicate what the variation shall be referenced against: ex: shall be within a 4-step ANSI MacAdam ellipse of the initial reading (or within ... of the nominal CCT blackbody locus).
- <u>Page 6:</u> The criteria for both the Under-cabinet kitchen lighting and Under-cabinet shelf-mounted task lighting's zonal lumen density require "no more than 75% of total lumens (initial) within the 0-60 degree zone". Do you really mean to require that 25% or more of the luminaire's light shall be above 60 degrees? That may encourage the design of luminaires with the potential to have a high amount of luminance (glare) at higher angles...
- <u>Page 6, 7, 8:</u> Under the "Zonal Lumen Density Requirement" sections: I think it's important to clarify the zone specification. It should say something like, "within the 0-90 degree vertical zone".
- Page 10: The reference to LM-80-XX should be: "IESNA LM-80-XX"
- <u>Page 14:</u> I believe that IESNA LM-80-XX is slated to be a guide for the life testing of solid state light sources (not specifically for lumen depreciation).