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From: Jiao, Jianzhong (OS SJ ADM) [mailto:jianzhong.jiao@osram-os.com]

Sent: Thursday, August 28, 2008 5:43 PM

To: ssl@energystar.gov

Subject: RE: NEMA and NGLIA: ENERGY STAR Solid State Lighting Luminaire Program Proposals

Dear the DOE Representative,

The lighting industry is unaware of any evidence that supports restricting CCT to 7000K or less for outdoor lighting applications. The LED technologies often lead to higher energy efficiency and productivity in the higher CCT range. The SSL Energy Star Manufacturing partners do not believe that high CCT sources are unacceptable for outdoor lighting applications nor do they believe that higher CCT would adversely affect overall acceptance of SSL outdoor luminaires. We would appreciate the U.S. DOE providing any information, studies, data, or other tangible evidence regarding CCT limitations for these applications that has been the basis of the DOE's proposal to limit the CCT. The SSL Energy Star Manufacturing Partners will cooperate with the DOE to establish reasonable limiting values and to develop guidelines and standards commensurate with the evidences. In the absence of such evidence, the industry cannot support "concerns about higher CCT" as an appropriate basis for federal standards or regulations. The SSL Energy Star Manufacturing Partners are also concerned about an issue that would negatively impact the growth of the SSL market where collectively they have invested heavily in the success of these products. Our concern is that an arbitrary CCT cutoff will be without real benefit and could negatively impact the goal of significant market penetration of SSL. The industry firmly believes that product performance requirements must be the result of vetted and validated technical or market data.

Thank you.

Jianzhong Jiao, Ph.D.

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