

**From:** petertao@neo-neon.com [mailto:petertao@neo-neon.com]  
**Sent:** Thursday, February 26, 2009 9:56 AM  
**To:** richard.karney@ee.doe.gov  
**Cc:** SSL  
**Subject:** Neo-Neon China comments on Integral LED lamps DRAFT 1-16-09

Dear Mr. Ruchard Karney,  
Kind please find the attachment.  
Thanks and Best regards,

Peter Tao  
Manager / Testing Center  
**Neo-Neon International Ltd.**  
Gong He Town, He Shan City, Guangdong, PRC 529728  
<http://www.neo-neon.com>

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**Jiuxiang Tao**, Manager / Testing Center  
& **Chuanghan Wang**, Ph.D. / Director  
**Neo-Neon International Ltd.**  
Gong He Town, He Shan City, Guangdong, PRC 529728  
<http://www.neo-neon.com>

Thank you for the opportunity to provide the following comments on the requirements for integral LED lamps DRAFT 1-16-09:

1, Replacement lamps - Equal to target lamp diameter :

Surely the same shape and size as target lamp would facilitate SSL replacement market, but the need for sufficient thermal management in an SSL product make it impossible to replicate incandescents□ whilst “Size and form factor were problems also for CFL replacement lamps through the mid-1990s.” - from p13 of “a-type lamp benchmark report (CALiPER)” , So it is not an equitable requirement for SSL replacement lamps.

2, Replacement lamps - Luminous intensity distribution:

The draft requiremt for an SSL omni-directional lamp also try to replicate incandescents, it would likewise be an ideal but not realistic requirement, the point of view could be justified from the testing result of Round 6 & 7 CALiPER.

Simultaneously, EU publish its darft commission regulation **“Implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for non-directional household lamps”**□ the draft regulation is open on the web site□  
[http://ec.europa.eu/energy/efficiency/ecodesign/regulatory\\_committee\\_en.htm](http://ec.europa.eu/energy/efficiency/ecodesign/regulatory_committee_en.htm)

We think it would be better to every stakeholder if DOE could harmonize its definition about "omnidirectional lamp -150° zone luminous intensity distribution" with EU's definition of "non-directional lamp".

For reference□the definitions of the EU's darft regulation is copied here:

"Non-directional lamp" means a lamp that is not a directional lamp;

"Directional lamp" means a lamp having at least 80% light output within a solid angle of  $\pi$  sr (corresponding to a cone with angle of 120°).

Thank you for your serious consideration and attention to our comments.

Contact JiuXiang Tao at (86) 750 8780223 or [petertao@neo-neon.com](mailto:petertao@neo-neon.com) for further discussion.

END COMMENTS.