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Dear California Energy Commission,

Dear Commissioner McAllister:

Thank you for the opportunity to comment on the revised 15-day proposal for small diameter directional LED lamps and General Purpose LED Lamps published on January 7, 2016.

The California Energy Commission (CEC) has proposed that general service LED lamps manufactured on or after January 1, 2018 shall have a CRI of 82 or greater and individual color scores (R) of 72 or greater. These new regulations provide an optimal combination of key performance attributes, luminous, color rendering and longevity.

The CEC has proposed stronger standards for LED lighting, which will save Californians billions in the coming years, and cut greenhouse gas emissions (GHG). These standards also allow us to enjoy the quality of full-color lighting we had with traditional light bulbs, but in an eco-friendly way.

However, opponents of the proposal claim the CEC wants to promote LED lighting that is more expensive and less efficient. This is a misunderstanding of what is being required of the lamps. The function of the general service lamp is to both illuminate a room and provide the ability to discern colors. Efficiency would be defined as its ability to perform both tasks with less energy. The opponents want to "improve" efficiency by making light bulbs that only do half the job. That's not efficiency, that's poor service.

In other words, the opponents want me to pay for bulbs that don't deliver.

As a consumer, I don't want the industry to short change me. I want robust standards that allow me to enjoy quality lighting at a price I can afford. I support the CEC's proposal and reject the opposition's efforts to weaken the standards.

Sincerely,

Pablo Cirulnick