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California Energy Commission
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Docket's Office
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As suppliers of CFLs, LED lamps and other light sources to many luminaire manufacturers, MaxLite has a strong interest in making sure that the revised Title 24 standards are achievable, manageable, and able to be implemented practically by our partner fixture manufacturers.

Please see our comments below regarding proposed revisions to Title 24 Part 6, 45-day language, and the recent revisions stated in the March 2nd WebEx:

Section 150.0, (k)

In multiple places in this section, there are references to luminaires containing or being supplied with light sources that meet the necessary requirements.

Already, there is much confusion among fixture manufacturers as to whether this means the luminaire manufacturer has to supply the light source in the carton with the fixture (as is currently the practice in ENERGY STAR Luminaires), or whether this means that an appropriate light source has to be installed in the fixture at the time of inspection.

Since the fixture manufacturer is in the best position, to evaluate whether a light source is appropriate for a certain type of luminaire, it is in the best interest of the consumer if the fixture manufacturer selects the appropriate light source and includes this selected source in the package with the fixture. This is precisely why the ENERGY STAR luminaires program requires such lamps to be included with the fixture.

Else, there is a strong chance that a contractor, distributor, etc. could place a lamp into the fixtures after the point of installation that could be a Title 24 acceptable source, but could be thermally, aesthetically, or otherwise inappropriate for the particular fixture.

Even if the Commission elects NOT to require including the light source in the carton with the fixture as a requirement, care should be taken to properly select the wording in this section so the intentions of the Commission are clear and not misinterpreted.

Table 150.0-A

We strongly support all GU24-socketed fixtures, including those that would use LED GU24 lamps, remaining to be classified as high-efficacy products.

Appendix JA8

JA 8.4.6 Dimming

MaxLite strongly opposes the dimming requirement of 3%, which is significantly down from the draft's 10% requirement.

3% is a particularly odd number to select, and it is unclear where this requirement originated. It is particularly challenging and costly to some lamp types to achieve 3% dimming, and including such a rigorous requirement will limit customer choice and potentially make some desirable items unattainable.

Particularly in smaller lamps such as candle lamps, 3% dimming may require additions of unattractive heat sinks at the base of the bulb envelope that would adversely affect the aesthetics of the lamp, and subsequently customer acceptance. Similarly, newer LED lamp technologies on the horizon such as "Retro Style" lamps that utilize LED "filaments" already struggle to maintain a customer-friendly design featuring little to no heat sink at the bulb socket, and include dimming at a 10% level. Trying to get to 3% will make it even more challenging.

It is likely that many of the smaller lamp types such as candles which customers typically want to be dimmed, will be sold in CA as non-dimmed to avoid the 3% dimming requirement.

We strongly encourage the Commission to maintain the dimming requirement at 10%.

[Note too that due to the language in this section, it is not clear in the document whether non-dimmable light sources can indeed be used and still be JA8 compliant]

JA 8.5 Marking

In lieu of the marking requirements stated, MaxLite supports the idea of an icon or symbol of some type that indicates the light source is JA8 compliant. Such a symbol makes the labeling of light source a bit easier for light source manufacturers.

Still, some miniature LED lamp types that are used to replace halogen such as G4, G9, etc. may have some challenges to include the necessary compliance and date code information. We recommend an exception to full marking language on lamps of diameter 1.6" or less. Such lamps could potentially need to show the JA8 compliance symbol only.



Thank you for taking the time to review our comments.

Regards,

A handwritten signature in black ink, appearing to read 'Chris Primous', with a horizontal line extending to the right.

Chris Primous
VP of OEM Sales
MaxLite
862-485-9878
Email: cprimous@maxlite.com