

DOCKETED

Docket Number:	15-AAER-06
Project Title:	Small Diameter Directional LED Lamps and General Purpose LED Lamps
TN #:	206826
Document Title:	David Maciel Comments: Sony Electronics - Comments to Amend Proposed Regulation
Description:	N/A
Filer:	System
Organization:	David Maciel
Submitter Role:	Applicant Representative
Submission Date:	12/3/2015 2:40:58 PM
Docketed Date:	12/3/2015

Comment Received From: David Maciel

Submitted On: 12/3/2015

Docket Number: 15-AAER-06

Sony Electronics - Comments to Amend Proposed Regulation

Additional submitted attachment is included below.



Sony Electronics Inc.,
16535 Via Esprillo, San Diego, California 92127-1898 Telephone (858) 942-4700

December 3, 2015

California Energy Commission
Commissioner Andrew McAllister and Staff
Appliances and Existing Buildings Office
Efficiency Division
1516 Ninth Street
Sacramento, CA 95814

Re: Docket #15-AAER-06, Small Diameter Directional and General Purpose LED Lamps

To Commissioner Andrew McAllister and Staff members:

Sony Electronics Inc., a leading manufacturer of consumer and non-consumer electronics and a proud partner of a number of ENERGY STAR programs appreciates the opportunity to comment on the Proposed Rulemaking for Small Diameter Directional LED lamps and General Purpose LED Lamps.

In addition to designing and manufacturing products used in our daily lives, our design teams continue to research and develop exciting new products and/or features in existing products that lead the way to reduce energy consumption in Audio and Video products. This approach is re-shaping many consumer products to offer additional utility and to reduce energy consumption and gas emissions. In that respect, Sony is proud to have developed the hardware and software to include set top box functionality in some televisions. Including set top box functionality in the television removes the need for an external set top box that would otherwise consume additional energy as a standalone device.

Sony continues to search for creative ways to combine functionality in other products focusing on devices that remain on any significant amount of time during the day; or on devices where any additional utility can benefit consumers while consuming the same amount of energy or less in some cases. A perfect candidate for expanding functionality is in lamp and lighting products.

Sony recently developed and launched a dimmable LED lamp with audio capabilities. The device connects to a conventional E26 socket just like a general replacement lamp does. The audio and acoustics design make this product similar, but not identical to an ANSI standard lamp shape A. The device connects via Bluetooth to network connected devices to reproduce music from a number of Apps available online. The Bluetooth connection does not provide means to dim the lamp. This device allows consumers to reproduce music and enjoy light at the same time at any location in the home without the need for another standalone audio product that would consume additional energy. It is important to note that incorporating the audio portion into a lamp presented challenges, making it impossible to meet any lamp shape available on the market today, as well as the omnidirectional luminous intensity distribution requirements.

We are also concerned with the proposed standby mode requirement of 0.2 watt or less. Connected lighting and lightning devices with additional features require standby mode levels similar to those described for consumer audio and video products. In addition, power adders may be required to account for Wi-Fi, Fast Ethernet, Giga Ethernet, occupancy sensors, proximity sensors, webcams and perhaps others. Sony is in the process of developing advanced features to be included in lighting products. We can only expect to see more of these combination products on the market in the future. No document produced by the Commission includes data or investigations for devices with additional features. Absent any data investigating these devices, Sony believes it is premature to regulate these devices at this point.



Sony Electronics Inc.,
16535 Via Esprillo, San Diego, California 92127-1898 Telephone (858) 942-4700

Lastly, the ENERGY STAR Program Requirements for Lamps version 1, and the soon to be released version 2, exclude lamps incorporating power-consuming features which do not provide illumination (e.g. audio functions, air fresheners, and cameras); and LED lamps that could be mistaken for a general purpose A-lamp replacement that do not meet the omnidirectional luminous intensity distribution requirements.

We respectfully request the Commission to apply the same exclusions found in the ENERGY STAR Program Requirements for Lamps in this regulation. Failure to do so will stifle innovation and prevent introduction of products that offer multiple functionalities and help achieve the savings the Commission seeks. We encourage the Commission to engage in further conversations with members of our company for further details and to learn about other products currently under development.

Thank you in advance for your careful consideration of our comments. Should there be a need to discuss these comments further, please contact us at your earliest convenience.

Sincerely,

David Maciel
North America Region Product Compliance
Service Engineering, Staff Engineer

Tim McGowan
North America Region Product Compliance
Service Engineering, Vice-president