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## **Comment on JA8 Elevated Temperature Life Test Procedure**

The newly created section JA8.9 Elevated Temperature Life Test Method seems to be missing a reference to an actual procedure. There is a reference to ANSI/IES LM-65 for life testing of CFL's but a more appropriate test method would be ANSI/IES LM-84 which is the "life" testing of LED Lamps, luminaires, and light engines.

The original elevated temperature test method within the ENERGY STAR(R) Lamps specification required that the ambient temperature be 45C for the "life" testing portion. The ambient temperature in section 8.9 is not specified but should be.

Since the DOE already requires a LED General Service Lamp (GSL) to be tested to LM-84 as per Appendix BB in Subpart B of part 430. It might be best to completely align with the DOE procedure except that the ambient temperature should be increased to 45C. Â

By aligning with the DOE procedures lamps that meet the definition of a GSL per the DOE would already have to conduct the applicable life test. A manufacturer could then utilize the same procedure and testing to also comply with the marking requirements of JA8 and by conducting the long term testing at 45C they could then meet the JA8-2025-E marking requirements concurrently.