

Docket Optical System - Fwd: Re: Exempted Outdoor Luminaires

From: Gary Flamm
To: Docket Optical System
Date: 4/25/2006 3:35 PM
Subject: Fwd: Re: Exempted Outdoor Luminaires

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| DOCKET 05-AAER-2 | |
| DATE | APR 25 2006 |
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Please docket the attached email message to

05-AAER-2

>>> Bob Erhardt <bob.erhardt@philips.com> 04/04/06 2:50 PM >>>

It is expected that electromagnetic ballasts will not be able to meet 88% efficiency at the lowest power levels (particularly at 150W and 175W). 175W metal halide is used extensively in outdoor applications which can see the stress extremes that the exemption was attempting to address.

In addition, "street lighting", which is subjected to some of the highest thermal and line voltage stresses, generally specifies "regulated lag" ballasts which have efficiencies lower than 88% even at higher power levels.

For these reasons Advance objects to removal of the exemption for outdoor luminaires.

Robert Erhardt
Advance Transformer