

California Title 20 Regulations

As it applies to Arkansas Lamp

July 28, 2010

We have reviewed the regulations outlined in California Title 20. Our conclusion is that there are no exceptions to the ruling except as noted below. The law applies to all sales in California: “if they are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state”. (Section 1601, Scope). We interpret this to mean that a dealer based in California can purchase lamps and ship them outside of California without meeting the Title 20 regulation. On the other hand, a dealer outside of California shipping to an address in California is subject to the rule, even if the purchasing occurs outside the state. Customers that are simply consolidating an order in California before shipping to the final destination are exempt from the law.

To comply with the law, we will either specify that a lamp has a dedicated fluorescent socket (GU24, for instance) or we will add a qualifying compact fluorescent bulb to the order. We also believe that adding an adapter that converts a standard medium socket to a GU24 socket complies with the regulation because if a user attempts to remove the adapter, the socket will be destroyed.

Since we sell in bulk, we will rarely include a bulb in the same box as the lamp. However, the bulbs will be included in the same shipment and on the same sales order, just like shades are usually boxed separately but are considered components of the lamp. In cases where there are back orders, the count on any individual delivery may not match, but once the order is totally fulfilled, the number of bulbs delivered must be equal or higher than the number needed for the fixtures on the order.

- For example: a customer needs 100 single socket lamps. We will enter a sales order for 100 lamps and 100+ bulbs. If we have to ship short, the first delivery may include 80 lamps and 100 bulbs and the final delivery would have 20 lamps only. The total delivered for the order still balances.
- Second example: a customer needs 100 dual socket lamps. We will enter a sales order for 100 lamps and 200 bulbs. If we have to ship short, the first delivery may include 100 lamps and no bulbs. The final delivery would include 200 bulbs. Again, the total delivered for the order balances.

We rarely sell magnetic ballasts anymore, but these are no longer allowed for sale in California. Very few (if any) of our customers will be effected by this requirement.

If anyone has any questions or can demonstrate how our practices are in error, please contact Jeff Null at 479-474-0876.

Here is the detailed requirement, taken directly from the regulation:

Excerpted from Title 20, 1605.3:

(4) Portable Luminaires.

(A) Portable luminaires manufactured on or after January 1, 2010 shall meet one or more of the following requirements:

1. Be equipped with a dedicated fluorescent lamp socket connected to a high frequency electronic ballast contained within the portable luminaire;
2. Be equipped with one or more GU-24 line-voltage sockets and not rated for use with incandescent lamps of any type, including line voltage or low voltage;
3. Be an LED luminaire or a portable luminaire with an LED light engine with integral heat sink, and comply with the minimum requirements shown in Table N-3;

**Table N-3
Minimum Requirements for Portable LED Luminaires, and Portable Luminaires with LED Light Engines with Integral Heat Sink**

Criteria	Requirement
Light Output	≥ 200 lumens (initial)
Minimum LED Luminaire Efficacy	29 lumens/W
Minimum LED Light Engine Efficacy	40 lumens/W
Color Correlated Temperature (CCT)	2700 K through 5000 K
Minimum Color Rendering Index (CRI)	75
Power Factor (for luminaires labeled or sold for residential use)	≥ 0.70

4. Be equipped with an E12, E17, or E26 screw-based socket and be prepackaged and sold together with one screw-based compact fluorescent lamp or screw-based LED lamp for each screw-based socket on the portable luminaire. The compact fluorescent or LED lamps which are prepackaged with the portable luminaire shall be fully compatible with the luminaire controls, meaning that portable luminaires having a dimmer control shall be prepackaged with dimmable compact fluorescent or LED lamps, and portable luminaires having 3-way controls shall be prepackaged with 3-way compact fluorescent or LED lamps. The compact fluorescent lamps which are prepackaged with the luminaires shall also meet the minimum energy efficiency levels established by ENERGY STAR® for compact fluorescent lamps in effect on December 31, 2008. The LED lamps required to be packaged with the luminaire shall comply with the minimum requirements shown in Table N-3;

5. Be equipped with one or more single-ended, non-screw based halogen lamp sockets (line or low voltage), a dimmer control or high low control, and be rated for a maximum of 100W.

EXCEPTIONS to Section 1605.3(n) (4). The following portable luminaires are not required to be prepackaged and sold together with compact fluorescent or LED lamps:

1. Portable Wall Mount Adjustable Luminaires that meet all of the following requirements:
Designed only to be mounted on a wall, having no base which will allow the luminaire to stand

on a horizontal surface, having an articulated arm, having a maximum overall length of 24 inches in any direction, fitted only with a single E-12, E-17 or E-26 lamp socket per luminaire, and controlled with an integral dimmer. Luminaires manufactured on or before December 31, 2011 shall have a maximum relamping rated wattage of 57 watts, and luminaires manufactured on or after January 1, 2012 shall have a maximum relamping rated wattage of 43 watts, as listed on a permanent pre-printed factory-installed label in accordance with Underwriters Laboratories (UL) 153.

2. Art Work Luminaires that meet all of the following requirements: Designed only to be mounted directly to art work only for the purpose of illuminating that art work, fitted only with E-12 screwbase line-voltage sockets, having no more than three sockets per luminaire, and controlled with an integral high/low switch. Luminaires with a single socket shall have a maximum relamping rated wattage of 25 watts, and luminaires with two or three sockets shall have a maximum relamping rated wattage of 15 watts per socket, as listed on a permanent pre-printed factory-installed label in accordance with Underwriters Laboratories (UL) 153.

(B) Portable luminaires that have internal power supplies shall have zero standby power when the luminaire is turned off.

(5) **GU-24 Adaptors.** GU-24 adaptors manufactured on or after January 1, 2010 shall not adapt a GU-24 socket to any other line voltage socket.