

## **Where It's Made and What It Is – Lies, Damn Lies and Gavita**

Behind all the marketing hype and claims that Brand A ballast is somehow brighter than Brand B ballast, even though both output the same amount of power, is the world of physical reality. Physics. Shipping Records. FCC Filings. Facts are stubborn things, and no amount of marketing spin doctoring can alter the brightness of a lamp or a product's country of origin.

Case in Point, Gavita “Holland”.

Gavita makes fine lights or, more accurately, has fine lights made for them. While claiming to be Made in Holland, their FCC filings clearly show otherwise:

<https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=2449784>

The above test report, filed with the FCC, was done by a Chinese ballast maker on behalf of their Dutch client. Note the photos of the fully assembled "Gavita" product under test.

Spoiler alert: The pictures were not taken in Amsterdam

Gavita's ballast electronics are made by Lumlux Lighting in Suzhou, China as filed by Gavita with the FCC. The electronics that provide the “essential character” of the product are manufactured, assembled, tested and certified in China. According to US law, Gavita ballasts must be labeled Made In China, since the essential character of the device is provided by the Chinese-made electronics, not the box, power cord or Dutch shipping label:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=78e98ccb76cfed37a3f79e280534d8be&node=19:1.0.1.1.13&rgn=div5>

The Made In Holland appellation is, at the very least, intentionally deceptive. While Gavita claims to have a factory in Holland, their ballasts are of Chinese manufacture as they were forced to admit on their import documentation. Photos of the Gavita factory are also devoid of any electronic assembly equipment – no wave or reflow soldering, no pick and place machines, no in-circuit test gear, none of the aging rooms or load banks you see at all other ballast makers. Just a lab for receiving inspection, test, light assembly, repacking and shipping.

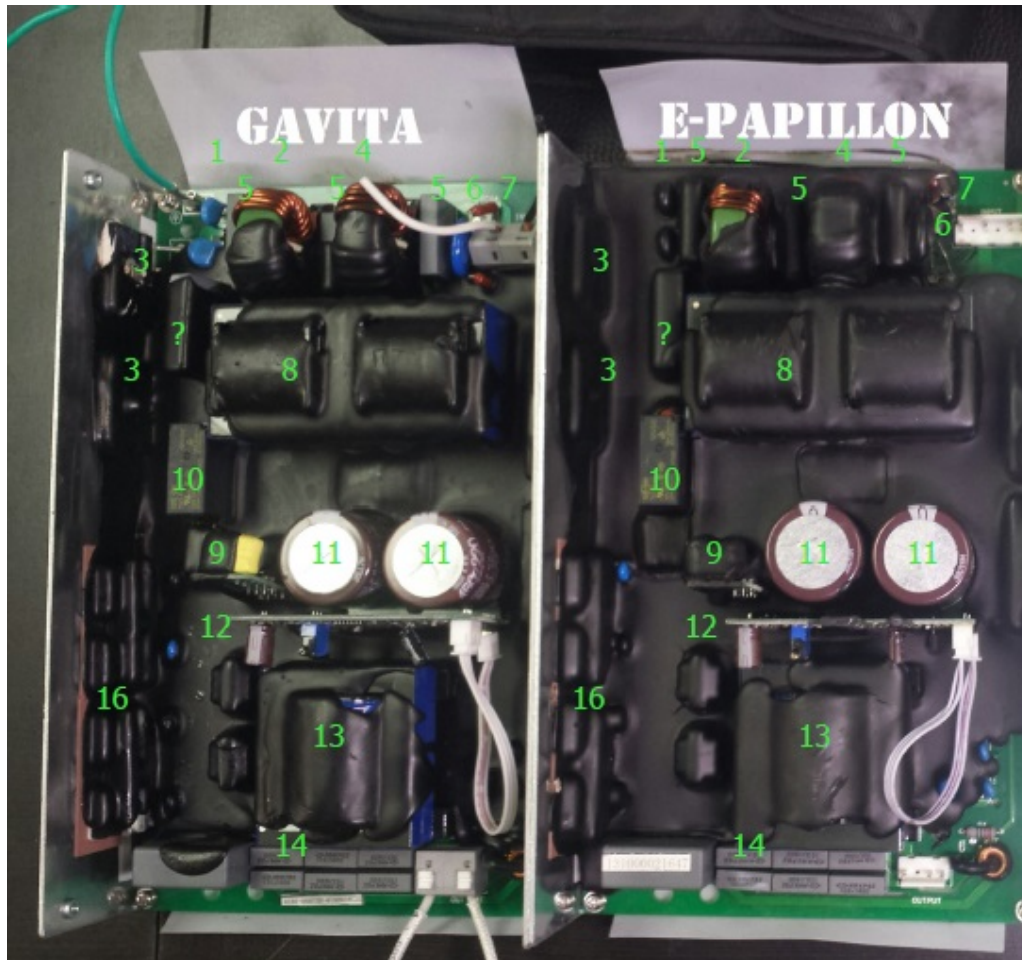
Since Made in China does not have the marketing cachet of Made In Holland, Gavita has also recently tried to obscure the origin of their product by changing the manufacturer of record on their FCC documents:

<https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=2560699>

Gavita ballasts are still made in Suzhou China by Lumlux Lighting, but newer documents will not be indexed that way.

Gavita also maintains that their products, while provably not made in Holland, are not copies of any

other device, but are of their own design. Covers-off photographs of the Gavita ballast next to the Philips ePapillon ends that discussion:



Labels are provided above since it is otherwise impossible to tell them apart. They are twins down to the lengths and placement of the test loops, the choice of semiconductors, brand and size of capacitors, and the direction and placement of passive components. The circuit board even duplicates the shape and placement of the copper wiring traces as can be seen at the bottom of the photo. These are not analogues, these are COPIES. EXACT DUPLICATES. Look at the photo, it's pretty clear.

Whatever is good or bad about the ePapillon design or about the Chinese, American or Nigerian manufacture of that design is not at issue.

What is at issue is marketing statements that claim this product was designed by Gavita and made in Holland. Neither of those two statements have any basis in physical reality, as can be seen above.

Questions worth asking:

1. According to public documents filed by you, your product is made, tested and certified in China. Why do you state Made In Holland on the packaging?

2. On what basis do you claim to have a factory making these ballasts in Holland when they are, per your own public documents, made in Suzhou, China by Lumlux Lighting?
3. How is your product different from the Philips ePapillion it so closely resembles?
4. According to your own public records, your FCC testing and certification is done in Suzhou, China. Why do you claim publicly that it is done in Amsterdam, Holland?
5. Why did you file with FCC in March of this year to change the manufacturer of record to Gavita from LumLux when LumLux is still making the product?
6. Are you familiar with the American import requirements indicating Country Of Origin under Title 19, Rule 102.11? How do you possibly claim Made In Holland under this rule?
7. Will Gavita voluntarily change packaging to state *Assembled in China* like Apple does, or wait until ordered to do so by US Customs?