GE Lighting

1975 Noble Road
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USA

September 16, 2011

Mr. Hampton Newsome
U.S. Federal Trade Commission
Office of the Secretary
Room H-113 (Annex Y)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Notice of Proposed Rulemaking on Expanded Bulb Coverage for the Lighting Facts Label
16 CFR Part 305, RIN 3084–AB03, Project No. P084206

Dear Mr. Newsome,

GE appreciates the opportunity to comment on the Notice of Proposed Rulemaking on Expanded Bulb Coverage for the Lighting Facts Label that was issued August 1, 2011. GE supports the comments of the National Electrical Manufacturers Association (NEMA) and provides the additional comments, attached.

Thank you for consideration of these GE comments. Please contact me if you have any questions about the issues raised by GE.

Sincerely,

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CC: Earl F. Jones
Phil Carino

COMMENTS OF GE LIGHTING ON THE FEDERAL TRADE COMMISSION NOTICE OF PROPOSED RULEMAKING ON EXPANDED BULB COVERAGE FOR THE LIGHTING FACTS LABEL, AUGUST 1, 2011

GE would like to place additional emphasis on 4 major issues with regard to expanding labeling coverage to included decorative lamp shapes. These four issues concern the unintended consequences of changing the definition of general service lamps, significant problems with labeling small packages, major functional issues with printing lumens on decorative lamp surfaces, and testing and reporting.

CHANGING THE GENERAL SERVICE LAMP DEFINTION

From the proposal, it is clear that FTC's intent in expanding the label to decorative lamps is to enable consumers to compare operating costs, lumen output and color of alternative decorative lamp technologies more easily. While GE supports the goal of consumer education, this goal has to be balanced with costs of compliance and limited to decorative products where labels add value, i.e. products that are purchased primarily by consumers in high volumes, compete with alternative technologies, and consume a meaningful amount of energy such that increased efficiency will affect a purchasing decision.

However, instead of just proposing to add the primary decorative lamp types that pass this test, the proposal would broadly change the definition of GENERAL SERVICE LAMP thereby covering many incandescent lamp types that clearly do not pass these value tests. This produces the unintended consequence of forcing manufactures to change the label of many lamp types where it has no value but adds significant costs to industry.

Between 90 and 95% of the decorative incandescent lamp shapes are made in the Globe (G), CA, B, or BA shape. Many of these shapes are also available in alternative technologies such as CFL or LED. These lamps can be made with medium screw, candelabra or intermediate screw bases. Per legislation, the highest wattage available in these shapes will either be 40w or 60 w depending on the base. The lowest common wattage is 25 watts. Incandescent lamps below 25 watts do not consume enough energy to effect consumer purchasing behavior. Therefore these lamp shapes, between 25 and 60 watts, which represent between 90 and 95% of all decorative lamps, would pass the value tests, and could be considered for the lighting facts label. Nonetheless, GE supports the industry position that adding the lighting facts label to these products should be done on a voluntary basis.

The following additional types of lamps would be unintentionally covered by the definition change:

T Lamps, primarily used in exit signs, showcases, and appliances. There is limited consumer use. T-lamps are principally used in commercial applications and represent less than 1% of the total regulated incandescent market. Moreover, there are few, if any, alternatives.

F lamps, also known as Flame-shaped lamps. These lamps are also less than 1% of the total regulated incandescent market. There are no known alternative technologies sold. In addition, the surface is irregular and it would be impossible to print information on the lamp itself.

S, or sign lamps. They are sold almost exclusively in the commercial market and represent less than 1% of the total regulated incandescent market.

M-14 lamps have represented a fraction of 1% of the incandescent market and have essentially no meaningful sales today.

C7 lamps or night lights. While not specifically called out by shape, and not considered a decorative lamp shape, the proposed definition change would inadvertently capture incandescent night lights. There is no meaningful energy consumption in a night light, which uses no more than 4 watts.

CA lamps under 25 watts use no meaningful energy. One such example is the 3 watt flicker flame CA lamp. This lamp provides a decorative flicker effect and provides no meaningful lumen output, yet would be captured by the definition change.

In summary, the proposal to include decorative lamps with a general service lamp definition change would capture many unintended lamp types. If decorative lamps are added, it should be done by defining each specific lamp type that meets the value test, not by the proposed broad definition change.

Labeling Small Packages

Just as it was important to allow some manufacturer packaging flexibility for the larger general purpose lamps, it is critical to provide flexibility for smaller decorative lamp packaging. Providing only a single option for packages less than 24 sq. inches does not do that.

GE recommends that FTC consider allowing the following options where the standard labeling scheme will not fit. FTC can limit these options to decorative lamp shapes if they determine that to be necessary:

1. Allow the front and/or rear box outline to be condensed if needed as long as the font size is unaffected.

2. Allow the required language in the rear boxes to be split onto more than one line to allow for unusual spaces as long as the font size is not affected.

3. Allow the front or rear label to be scaled by no more than 80% of required size as long as the print remains legible.

4. FTC offers a compressed label for packages less than 24 sq. inches in size. While GE appreciates this additional flexibility for smaller packages, almost none of the lamps covered by regulation would actually fit into a box of 24 sq. inches, (basically a 2" x 2" x 2" shape). To be able to use this provision on the smallest lamp types and packages, GE recommends that the compressed label be allowed for packages up to 48 sq. inches or perhaps, at a minimum, of 36 sq. inches. In addition, consider allowing space taken up by required warnings and graphics to be excluded from the 24 sq. inch or 36 sq. inch requirement.

5. Allow a second language to be scaled at no less than 80% of English version as long as print remains legible.

Printing Lumens on Decorative Lamp Surfaces

Printing lumens of decorative lamp surfaces is unacceptable due to the very nature of the product. These lamp types are used for interior decoration. As such, printing on lamp surfaces is unacceptable to homeowners and designers who use these products. In addition, some decorative lamp types, such as Flame and Crystal have surfaces which are technically impossible to print on. If any decorative lamps are required to have the lighting facts label, they should be exempted from the lamp labeling requirements.

Testing and Reporting

Decorative lamp types are not covered by minimum Department of Energy efficiency regulations. As such, these lamps should be excluded from onerous testing and reporting requirements. If reporting is required, it should be based on self-certification. This self-certification system worked acceptably for general service lamps since 1995. Such a system would be more than acceptable for decorative lamps not covered by minimum efficiency regulations.