

**Comments on FTC Lighting Labeling Rule and the July 19, 2010 CFR
RIN 3084-AB03**

Alliance to Save Energy
American Council for an Energy-Efficient Economy
Appliance Standards Awareness Project
Consumer Federation of America
Midwest Energy Efficiency Alliance
Northeast Energy Efficiency Partnerships
Northwest Power and Conservation Council
Southeast Energy Efficiency Alliance
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Please find attached joint comments on labeling requirement for new lamps in response to the Federal Trade Commission (FTC) request for information published in the Federal Register on July 19, 2010.

Our organizations, representing energy efficiency advocates and consumer groups, commend the FTC for their work to provide consumers with accurate, easy-to-read labels for light bulbs. What used to be an easy choice for American consumers is now complicated with the proliferation of new technologies and styles of light bulbs – and the pending phase-out of today's conventional, inefficient incandescent light bulbs beginning in January 2012 (or January 2011 in California).

The FTC labels will make it easier for consumers to choose a light bulb that both meets their lighting needs and is energy efficient, saving them money in the long run. With lighting representing approximately 15% of residential electricity use, it's critical to provide consumers with accurate and comprehensive data on the light bulb package.

To ensure that consumers have all the facts that are needed to make an informed choice, we offer the following two recommendations, as documented in more detail in the separate comments to this docket submitted by the Natural Resources Defense Council (NRDC):

1. Require all screw based lamps to be covered by the lamp labeling requirements. We can think of no reason why products with various size screw bases should have different labeling requirements. To exclude some of these products from the labeling requirement would add to the confusion that consumers experience when purchasing lighting products and limit the opportunities for the purchase of efficient lighting.
2. If manufacturers wish to compare the power consumption (W) of their products with that of conventional incandescent bulbs providing the same light output, they should be allowed to do so. However, their claims should abide by wattage equivalency guidelines established by the FTC. We encourage FTC to use the tables already developed by the ENERGY STAR program and to apply them to all products except reflector lamps. FTC should also develop a similar table for reflector lamps.

We would also offer a third recommendation, reiterating a point made in previous comments to the FTC (joint comments prepared by NRDC and ACEEE, December 22, 2009). We believe that, at the present time, the most helpful way to inform consumers is to express relative lamp lifetime in hours, not years (with the calculation of life in years based on an assumed 3 hours/day for all users). Since most of the screw-based lamps available once the new lamp standards take effect (beginning January 2012) will be either CFLs or improved halogens, the range of lifetimes for these products, if stated in years, may not be broad enough to help consumers make useful distinctions. Conversely, as more (screw-based) solid-state (LED) light bulbs enter the market, it may not be helpful to consumers – or justified by the degree of testing accuracy available now – to express the much longer lifetime of these products in hours. One solution might be to allow (or require) manufacturers to show the lifetime in hours for all lamps up to 10,000 hours (for example), or approximately 9 years based on the assumed 3 hours/day. Beyond 10,000 hours the lifetime (mainly for LED products) could be expressed in years

Finally, in its preliminary rule the FTC noted that Natural Resources Canada (NRCAN) had decided that the Canadian label would show lamp lifetime in years rather than hours. We would note that NRCAN appears to have changed this initial approach, since the latest notice on the Canadian light bulb label (July 2010) now shows lifetime in hours (<http://oee.nrcan.gc.ca/regulations/bulletin/lamp-labelling-july2010.cfm?attr=0>).

Adding these requirements to the FTC lighting label will assist consumers and will encourage efficient lighting choices. With 15% of residential electricity use at stake, providing accurate, comprehensive information is the right thing to do.

Respectfully submitted,

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