



GE Consumer & Industrial Lighting

1975 Noble Road
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Lamp Labeling, Project No. P084206

RE: Comments on Federal Trade Commission's - Advanced Notice of Proposed Rulemaking – Lamp Labeling

GE appreciates the opportunity to provide comments on the FTC's advance notice of proposed Rulemaking for lamp labeling. In addition the following comments, GE supports the NEMA comments submitted separately.

1. **Mandatory Federal Labeling** - GE is in agreement that the Watts, Lumens and Life required on the current label should be required on the package. Location to be determined by marketing departments. Location options should not be restricted to only the front of the package. In addition, GE would agree to mandating the Color Temperature in Kelvin temperature, as currently required in the ENERGY STAR® specification for Compact Fluorescent lamps and ENERGY STAR® Light Emitting Diode specification. These four metrics should be required for Incandescent lamps, and Compact Fluorescent and LED sources designed to replace general service incandescent lamps. Alternatively, CRI should not be required on consumer packaging. The federal EISA law already requires high CRI values for these products.
2. **Optional Federal Labeling** – Manufacturers should have the option of including the following information. However, if any of the following are included, the FTC should apply calculation rules, so that products from different manufacturers can be fairly compared across the country.
 - a. **LPW** – Lumens per Watt – Divide the Lumens shown on the package by the Watts shown on the package.
 - b. **Life in Years** - Set a maximum life-in-years rating by calculating life in years using the requirements in the EPA CFL ENERGY STAR® specification for estimating expected hours of operation per year of at least 3 hours per day. Manufacturers can estimate a longer operation per day if they want to display a more conservative (shorter) life estimate. The basis of such estimates should be fully disclosed on the package. Divide the

lamp life rating on the package by the expected operating hours per year based a minimum of 3 hours per day. Calculation shall be rounded down to the nearest number of years. Number of years claimed can be no greater than this number.

- c. **Operating Costs Per Year** – Using: The wattage listed on the package, 3 hours per day operation, and an average US electric rate in cents per kWh, to be determined by the FTC, calculate the expected operating costs per year. The FTC should update the average US electric rate wherever there is a significant change in electric rates, or, at least every 5 years.
 - d. **Operating Costs over lamp life** – Using: The wattage listed on the package, the lamp life listed on the package, and an average US electric rate in cents per kWh, to be determined by the FTC, calculate the expected operating costs over the lamp life. The FTC should update the average US electric rate wherever there is a significant change in electric rates, or, at least every 5 years.
3. **State Mandated Labeling** – The FTC can address State Mandated labeling requirements for these products such as the VT mandated mercury-labeling requirement for Compact Fluorescent Lamps.
 4. **Comparison Issues** – The issue of product comparisons is complicated.
 - a. Individual marketing companies have a variety of ways to compare their products with alternative products and will continue to employ a variety of marketing techniques. It is difficult to mandate a specific approach that will stand the test of time. Comparing a product to a standard 60-watt incandescent lamp today makes sense, but it may not make sense in the future.
 - b. The ENERGY STAR® specification does require product comparisons to be fair. If you are comparing your product to an alternative product it has to have a reasonably similar lumen output. For example, a CFL product marketed to replace a 60-watt incandescent product must have a minimum lumen output of 800 lumens. As the future will provide many different technologies with different light outputs, there will be potentially many different possible comparison products. Under this situation, a general approach is viewed as best. If one product is compared to another product on energy savings, it must have a light output at least within 10% of the most typical version of the comparison product. If an energy savings comparison is made on an annual basis, both products would have to be evaluated using the rules of Operating Costs per year, or, if over lamp lifetime, using the rules for Operating Costs per lifetime.
 - c. Additional comparison ideas will be developed by individual marketing departments, but should not be mandated. Such approaches, like showing equivalent incandescent wattages common today, will not stand the test of time unless this is turned into some type of “brightness” model number. Additional research can assess if consumers strongly equate “brightness”

to the traditional wattage number. New marketing approaches will have to be developed.

- d. Additional marketing ideas, such as using a 5-Star label to convey energy efficiency will have little consumer understanding and should not be used. It will be confused with the ENERGY STAR® Label which is an energy efficiency label. It also could be confused with the consumer reports rating system, which is a measure of value and quality and not energy efficiency. Finally, the annual energy operating costs will already convey the energy efficiency of the product allowing an appropriate energy efficiency comparison.
5. **Label Location** – The location of the mandatory and optional labeling information should be left to individual company marketing departments. FTC can use the name ENERGUIDE as the name of a comprehensive lighting label.
 6. **Testing** - When measuring applicable performance attributes required for FTC labeling and other commercial claims, the industry, including NEMA Lamp Section members, use test methods and procedures developed, adopted and published by IESNA. These procedures have been previously accepted by FTC for test methods and are referenced under 305.(b) of the current Rule. These test methods remain the accepted test method procedures within the industry and should be maintained by FTC in any revised Rule. These test methods are also used to comply with certain aspects of EPCA and are also used by NVLAP when accrediting lighting test and measurement laboratories. FTC should leave all current testing requirements in place; no changes are needed.
 7. **Consumer Research** – The FTC should research consumer's perception and understanding of brightness and how this is related to lumens or wattage. FTC should also evaluate nomenclature to get a good idea of what terms consumers understand and what they don't understand. The FTC can also evaluate consumers understanding of lamp color. While names of colors can be testing for understanding, individual companies should have the ability to develop unique marketing names for products.

GE Consumer & Industrial spans the globe as an industry leader in lighting, major appliance, and integrated industrial equipment, systems and services. Providing solutions for commercial, industrial and residential use in more than 100 countries, GE Consumer & Industrial uses innovative technologies and "ecomagination," a GE initiative to aggressively bring to market new technologies that help customers and consumers meet pressing environmental challenges, to deliver comfort, convenience and electrical protection and control. General Electric (NYSE: GE) brings imagination to work, selling products under the Edison™, Energy Smart™, Reveal®, Monogram®, Profile™ GE®, and Hotpoint® consumer brands, and Entellisys™ industrial brand. For more information on lighting products, visit www.gelighting.com.