

## GE Consumer & Industrial Lighting

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23 March 2009

Mr. Hampton Newsome Federal Trade Commission, Office of the Secretary, Room H-135 (Annex J), 600 Pennsylvania Avenue, NW, Washington, DC 20580

## SUBJECT: Lamp Labeling Study, Project No. P084206

Dear Mr. Newsome,

General Electric appreciates the opportunity to submit comments on the Federal Trade Commission's (FTC) Lamp Labeling Study, Project No. P084206 to "consider alternative labeling approaches that will help consumers better understand new high-efficiency lamp products and help them choose lamps that meet their need." Generally, GE supports the NEMA comments and offers these additional for consideration.

**Methodology Bias** – The studies' design will only test for a series of solutions that assumes that there will be information on the package front and on the back or side panels.

Consumers have a low interest in lighting's technical issues and allowing consumers the opportunity to be educated or informed through effective marketing is not part of this studies' design.

**Incandescent Wattage Reference** – We would not consider testing methods of communicating light output by way of comparison to existing incandescent bulbs. A transitional tactic that compares to incandescent only prolongs the inevitable and changing packaging twice will place undo costs on the industry. A method on the facts-label that pictorially illustrates brightness should be tested that doesn't reference obsolete products. Remember that on many products, 4-color printing on the backs is not currently in the product's cost structure.

**Testing Duplicate Information on Package Front and Sides** – Packages are becoming smaller to maximize retail space and to lower material usage, but being required to have the same information on the front and sides will make the copy so small as to be unreadable. There are also required warranty statements, FCC warnings, state required Mercury warnings, CPSC warnings, UL listings, addresses, country of origin and UPC codes to name a few that will still need to fit on these shrinking packages.

**No Design That Tests Side Label Only** – As stated above, space is at a premium and if we use food labeling as a guide, they require a side or back label only with the front for marketing information only (except quantity or weight). These labels have changed the way consumers buy products without changing the way manufacturers market or neutralizing unique product attributes. Note that the food-labeling is flexible and only pertinent information is on the their labels, again simplifying the purchase process and avoiding confusion.

**Study Design Not Typical Of The Retail Shopping Experience** – Consumers do not take 20 minutes to study lighting packages, as they will in this study. The retail environment is crowded, busy and visually stimulating and they typically make a decision in as little as 15 seconds. This study design may lead to analysis that misleads you into thinking that these proposals are an effective communication tool. Many other techniques are available that are better at simulating the typical purchase process.

**Not Testing Pictorial Solutions On The Back Label** – There were several proposals at the hearing that brought pictorial solutions to the "facts" label on the back but only one is proposed here. Brightness, color temperature, life, and efficiency could all be tested in a pictorial format.

**Solutions Suggest A Commoditized View Of Lighting Products** – With no testing of potential marketing based solutions, this shows a bias toward technical solutions that tend to show lighting as an industrial product or a commodity. The space needed to accomplish these proposals will limit any consumer-based information that simplifies competitive choice.

**No Mercury Notice Testing** – **No Mercury Notice Testing** – A uniform national approach is needed for mercury content labeling, and we urge FTC to consider a consistent notice that would be appropriate to these packages size and is part of the lighting facts that would clearly convey mercury content. The Energy Independence and Security Act of 2007 called on the FTC to consider alternative labeling approaches that will help consumers better understand new high-efficiency lamp products and help them choose lamps that meet their needs. Going forward, GE C&I anticipates that the mercury content of these products may well be an issue of significant interest to consumers. Thus, for the FTC to not include mercury content labeling as part of its labeling considerations, it may well be missing an opportunity to allow consumers to better understand these high-efficiency products. We believe that the food-labeling model provides a useful guide in this endeavor. For example in food packaging, the simple notice, "May contain peanuts." serves all concerned consumers in a uniform and easily understood way.