

KYLE PITSOR

Vice President, Government Relations

January 28, 2010

Donald S. Clark, Secretary
Office of the Secretary
U.S. Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

RE: Appliance Labeling Rule, Proposed Rule
16 CFR Part 305

Dear Mr. Clark:

The National Electrical Manufacturers Association (NEMA), on behalf of its member companies who manufacture lamps, thanks the Federal Trade Commission (FTC) for their proposed extension of the lamp label implementation deadline to January 1, 2012 (**16 CFR Part 305**). NEMA also thanks the FTC for proposing not to require new labels for bulbs that, as of 2013, will not meet new federal energy efficiency standards under the Energy Independence and Security Act of 2007 (EISA). However, NEMA feels that additional extensions for certain products are still needed.

NEMA is the trade association of choice for the electrical manufacturing industry. Founded in 1926 and headquartered near Washington, D.C., its approximately 400 member companies manufacture products used in the generation, transmission and distribution, control and end-use of electricity, including lamps.

For reasons explained in our petition to the FTC dated October 27, 2010, as well as the point made below, NEMA is requesting a reconsideration of the effective date for compact fluorescent lamps (CFLs) to January 1, 2013. NEMA also notes that the current effective date extension to January 1, 2012, while helpful, provides less than six months relief for lighting manufacturers and the difficulties outlined by NEMA in its Petition are not solved in that timeframe.

NEMA also notes that lighting manufacturers and retailers conduct their product reviews during the 3rd quarter of a calendar year in advance of the “lighting season,” which takes place during the 4th and 1st quarters of a calendar year. An extension from

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July 19, 2011 to January 1, 2012, as proposed in the FTC response to the NEMA petition, in practicality would be shorter than six months, thus providing minimal relief for the manufacturers. NEMA again requests that the effective date for CFLs be extended to January 1, 2013. NEMA also notes that the Natural Resources Defense Council, the Alliance to Save Energy, the American Council for an Energy Efficient Economy, and the Appliance Standards Awareness Project agreed with this request in its comments to the FTC dated November 10, 2010.

Since the passage and signing of EISA, NEMA lamp manufacturers have been dis-investing in general service incandescent technology and investing in research and development for more efficient lighting. As stated in our October 27, 2010 Petition to the FTC, the new labeling requirements, which include incandescents, would require lamp manufacturers to make additional capital investments in products that will soon be off the market. We ask the FTC to reconsider this issue and exclude all general service incandescents that will be off the market by 2014, as required by EISA.

To summarize, NEMA requests the following from the Federal Trade Commission. (1) Amend the effective date for CFL products to January 1, 2013. (2) Exclude all general service incandescent lamps from the lamp label rule that will be off the market by 2014 under EISA 2007 standards.

Very truly yours,



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