September 22, 2011

Federal Trade Commission, Office of the Secretary,
Room H–113 (Annex Y), 600
Pennsylvania Avenue, NW.
Washington, DC 20580

REF: Comments on FTC "Notice of Proposed Rulemaking on Expanded Bulb Coverage for the Lighting Facts Label" (16 CFR part 305); Project No. P084206

The undersigned energy efficiency and consumer advocacy organizations are pleased to have this opportunity to comment in response to the Federal Trade Commission (FTC) Proposed Rule noted above, that would expand coverage of the Lighting Facts label to include all screw-based and GU–10 and GU–24 pin-based light bulbs, after a lead time of 2-1⁄2 years to allow manufacturers to bring their products and packaging into conformance.

Our comments focus on four areas:

- Support for Comments submitted by NRDC;
- Schedule for Labeling Additional Lighting Products;
- Candelabra Based Lamps; and
- Rough-service and Shatter-resistant Lamps

Support for Comments Submitted by NRDC

With the addition of several points included in this letter, we endorse the comments submitted by the Natural Resources Defense Council (NRDC) in this FTC proceeding, regarding:

- Expanding the coverage of general service lamps to require labeling for all screw-based incandescent, CFL, and LED lamps, as well as certain pin-based lamps.

- Need for a follow-on FTC rulemaking to establish minimum "incandescent watt equivalency" criteria governing any manufacturer claims and which would ultimately provide clear guidance for FTC enforcement.

- Inclusion of certain specialty lamps in the labeling requirements, i.e., those that could serve as a replacement for conventional general service lamps such as appliance lamps, shatter-resistant or shatter-proof lamps, vibration service and rough service lamps.

- A follow-on FTC rulemaking regarding beam spread information in labels for directional lighting.

- Support for the industry proposal to use LM-79 as the test method for light output of LED lamps.

Schedule for Labeling Additional Lighting Products

While it is reasonable to allow manufacturers a reasonable time to modify their products and packaging, the proposed waiting period of 2.5 years seems excessive and inconsistent with the need to inform consumer decisions in anticipation of the new national light bulb efficiency standards.

We propose that the lead-time allowed to manufacturers for labeling these additional lamp categories be at least one year from the date of a final FTC Rule, but no later than January 2013 – or one year prior to the effective date of national standards that will cover 40W and 60W equivalent, medium-base lamps. The 60W equivalent lamps alone, according to industry estimates, account for about half of all GSL lamps sold in the U.S. This timetable will assure that the label is available for an essential period of consumer education prior to the effective date of new standards for this major category of lamps.

If the FTC determines that this deadline cannot be met for all added lamp types covered by the Proposed Rule, we strongly recommend that it be applied to certain categories that are most likely to be marketed to consumers as low-priced but inefficient substitutes for medium-base GSL lamps covered by the federal efficiency standards, notably candelabra-base, intermediate-base, rough-service, and shatter-resistant lamps. The basis for this recommendation follows.

Candelabra and Intermediate Based Lamps

Of the additional categories of lamps covered by the proposed new FTC rule, we are most concerned about FTC labels for candelabra (E12) and intermediate-base (E19) lamps (for example, those intended for ceiling fans), since these can easily be used, with an inexpensive converter-base, in the estimated 2.5 billion medium-base (E26) sockets currently in place, as a substitute for the more efficient GSL lamps required by the national standards.

Some candelabra and intermediate-base lamps are comparable in energy consumption and light output to today's conventional, 40W or 60W medium-base incandescent lamps and very similar in shape, size, and appearance – but are **not** currently subject to the national light bulb efficiency standards. An example of this product is shown here (from http://www.lampsplus.com/products/light-bulbs/usage_candelabra/wattage_42w-@-60w/#).

It is important to inform consumers about the significant variations in energy efficiency, operating cost, and lifetime between these conventional (smaller-base) incandescent lamps and the more energy-efficient (halogen) incandescents, CFLs, or LED technologies that do comply with the national light bulb standards.

Our online research discovered 60W candelabra based light bulbs selling for as little as $0.65 per bulb (http://www.1000bulbs.com/product/5189/DEC-103024.html). We also located more than one company selling inexpensive adapters (under $3) that covert a standard medium-base socket to accept a candelabra base lamp (the example below is from: http://www.buylightfixtures.com/medium-to-candelabra-base-socket-adapter.aspx. There are similar base-converters available for under $4 for intermediate-base lamps to use them in a medium-base socket (http://www.greenelectricalsupply.com/e26-medium-to-e17-intermediate-base-light-socket-reducer-adapter.aspx).

List Price: $3.95
Your Price: **$2.95**
Item Number: BLF-MEDIUM-TO-CANDELABRA-SOCKET

Quantity: 1 ADD TO CART

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Medium to candelabra socket adapters are made specifically to take your medium base incandescent socket to a candelabra base. Medium is the same as a standard household light bulb base which are used everywhere. A simple retrofit takes your standard fixtures into a new base without having to change anything electrically. With this simple change, you'll save money and be able to use any candelabra base incandescent you have. It's also known as a socket reducer taking the larger medium base to E12. It can be used for places where you need the more decorative look that often accompanies the smaller base.

As another example of confusing packaging that could be improved by extension of the FTC Lighting Facts Label, on type of intermediate based light bulb for sale advertised itself as EPACT 2005 compliant presumably because of its E17 base, even though that law had no efficiency requirements for light bulbs. See image below (from http://www.lightbulbemporium.com/bulbrite_104261_60a15c_e17.asp).

Once the federal light bulb standards, are fully in effect (including 40W and 60W equivalent GSL lamps in January 2014, and January 2013 in California), candelabra and intermediate-based bulbs could thus be marketed – along with base adapters – as inexpensive but inefficient alternatives to the 60W general service incandescent. When comparing incandescent candelabra or intermediate-base bulbs to more energy efficient alternatives like halogen-incandescents, CFLs and LEDs, consumers will need the comparative information provided on the Lighting Facts label to make a fully informed decision.

Extending coverage of the FTC label to these easily-substituted lamp types can thus help consumers avoid the temptation to buy a lower first-cost but much higher operating-cost product.

Rough-Service and Shatter-Resistant Type Lamps

Similarly, we strongly urge FTC to extend the Lighting Facts label to include rough-service and shatter-resistant lamps. Rough-service and shatter-resistant lamps are both potential inefficient alternatives to general service incandescents that may be inexpensive to purchase but costly to operate. We easily found rough-service light bulbs (60, 75, and 100W equivalents) for under $1 per bulb (http://www.1000bulbs.com/category/rough-service-light-bulbs/) and shatter resistant bulbs for less than $2 per bulb (http://www.1000bulbs.com/category/shatter-resistant/). As noted in their comments, NRDC located a 12 pack of 60W "vibration service" conventional incandescent bulbs for only $3, putting the price per bulb at $0.25. Even though future sales will be limited to 2 bulbs per pack, it is highly conceivable that these will be marketed as another low-first-cost alternative to more efficient 60W equivalent GSL lamps covered by the new federal standard. Once again, to properly compare these types of bulbs to more energy-efficient alternatives like halogen-incandescents, CFLs and LEDs, consumers will need the Lighting Facts label to make a fully informed decision.

Thank you for the opportunity to comment on the proposed FTC Rule. For more information please contact Marianne DiMascio, Outreach Director, Appliance Standards Awareness Project, mdimascio@standardsasap.org.

Respectfully submitted,

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