



## GE Consumer & Industrial Lighting

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

**RIN NUMBER: 3084- AB03**

**SUBJECT: 6 CFR Part 305: Proposed Amendments to the Appliance Labeling Rule That Would Change the Existing Labeling Requirements for Lamp Products (Light Bulbs)**

**RE: Comments from GE on FTC Lamp Labeling Proposal**

GE appreciates the opportunity to submit comments on the Federal Trade Commission's (FTC) Lamp Labeling Rule, Project Number P084206. GE is also supportive of the NEMA comments on this proposal.

In general, GE supports FTC's proposal to provide a standardized lamp package label requirement similar to a Nutritional label for food packages. We note that nutritional food labels are required on the side or back of food packages. The front of the package is left open for companies to present the product's marketing message. This message may or may not include emphasis on information found on the nutritional label. Food packages are not required to list any one particular piece of information, such as "fat content", on the front of the package. We feel that lighting packages should be treated in a similar way, with manufacturers given the option to highlight any or none of the information on the lighting label.

### **Products Eliminated by the 2007 Energy Independence and Security Act & DOE Regulations**

New product energy efficiency regulations on incandescent lamps will eliminate several standard incandescent light bulbs (between 40W and 100W) in 2012, 2013 and 2014. Several types of Halogen PAR lamps and 4' T12 lamps will be eliminated on July 14, 2012 by new DOE regulations. Any product scheduled to be eliminated by federal

government efficiency regulations in 2012, 2013 or 2014 should not be required to be relabeled to meet the new standards. New package labels are very expensive. Creating new package labels for products soon to be eliminated is not an effective use of American industry capital.

### **Small Packages**

FTC needs to provide options for packages that are simply too small to fit the proposed label size. If the package is too small to accommodate the standardized label size, it can be modified as necessary, as long as all information is presented in a clear and legible manner.

### **Multi-Packs**

If the package contains more than one lamp type, such as one incandescent lamp and one CFL lamp, or, two CFL lamps with different color temperatures, the FTC should specify the labeling requirements for such multi-packs.

### **Calculations and Packaging Changes**

All claims on lamp packages should be based on a calculation using prescribed national averages. The proposed assumption of 3 hours per day use and 11.4 cents per kWh is acceptable. Manufacturers should not be allowed to vary these claims on the lighting facts package label, as essentially all manufacturers sell into a national market with varying electric rates. Manufacturers wishing to make regional claims should be allowed to do so on marketing materials or websites, but not on the package to prevent gaming or exaggerated claims based on exorbitant electric rates.

We agree that national averages should be reviewed approximately every 5 years. If changes are made to these national averages, manufacturers should be allowed to incorporate these changes on a rolling basis as packages are changed over one to two years. Packaging changes are very expensive. The proposal grossly underestimates the actual costs of changing packages.

### **Consumer Education Plan**

We agree that a more extensive consumer education plan is needed that goes beyond a simple conversion chart at point of sale.

### **Comments on Lighting Facts Label Content – Back of Package**

#### **Brightness**

The term brightness is acceptable to convey light output in lumens.

#### **Estimated Yearly Energy Cost**

The concept of conveying a yearly estimated operating cost is acceptable. The proposed assumption of 3 hours per day use and 11.4 cents per kWh is acceptable and should be mandated for all packages. FTC needs to decide how data is rounded up or down.

The note "Your cost will depend on your rates and use" can be shortened to, "Will vary by your rates and use". It is just as effective and uses less space.

### **Life In Years**

It is acceptable to state life in years as long as the calculation is consistent on this label using the same 3 hours per day assumed on the estimated yearly energy cost.

### **Color Appearance**

The Scale approach is acceptable with these additional comments:

- The scale printing is preferred in color but Black and White, or one-color is acceptable depending on color availability on a print run.
- As suggested, we prefer the term "Light Appearance" vs. "Color Appearance". Color appearance may give the false impression to the uneducated consumer that the lamp is a colored lamp.
- The actual color temperature of the lamp should be printed in bold on top of the scale. The scale range should be printed below the line to provide information on the range of possible color temperatures. Warm and Cool can be printed at either end below the line. The numbers 2700K, 4100K and 6500K should also be printed below the scale to indicate the possible range. This presents a consistent scale that cannot be shown to favor one product's position over another's by shortening or lengthening the scale.

### **Energy Used**

The Energy Used proposal is acceptable.

### **Energy Star**

ENERGY STAR® should be an option on the Lighting Facts Label and not be required on both the Front of the Package and on the Lighting Facts label.

### **Front of Package**

As already mentioned, we would prefer the front of the package be left to the discretion of an individual company's marketing department.

However, if FTC persists in requiring Brightness and Estimated Yearly Cost on the front of the package, we have comments on this approach. This proposal attempts to replace the current common purchasing approach of using 40W, 60W, 75W and 100W with a new approach centered on communicating brightness in a new way and not by referring to wattage. Note that there is 4 distinct wattage numbers here that are common among all manufacturers and easy for consumers to remember.

If you actually place a lumen value, measured to a single lumen on the front of the package, manufacturers will have values that are all over the map and not easily remembered by consumers. To make the lumen value memorable and consistent, the lumen values would have to rounded in a meaningful way. Consumers cannot perceive a brightness difference if the lumen measurement of two lamps are within

10% of each other. In other words, 820 lumens appears about the same brightness as 790 lumens to most consumers if placed side by side. To allow consumers to compare true brightness difference between products, lumen values used on the front of the package should be rounded to the nearest 100 lumens, representing a "lumen class" of lamps. Of the two lamps shown above, the front of the package of both lamps would display the Brightness Class of "800 lumens". (The back of the package would still have the actual lumen value for those who wanted to know.) In other words, lamps between 750 and 850 lumens would be rounded to 800 lumens. The 800 Lumen lamp class is equivalent to the old 60 watt lamps, and, with some education, consumers will soon be looking for "800 Lumen" lamps, as opposed to "60 watt" lamps. This is much more likely to succeed if everyone uses "800 Lumens" on the front and not "823", or "790", or "841", or "783" lumens, which will be very confusing to the consumer and all would look about the same brightness when they got them home. In this way there would be lumen classes of 50, 100, 200, 300, 400, 500, 600, 700, "800", 900, 1000, 1100...and so on. We can educate the consumer that the old "60 watt" brightness lamp is the new "800 lumen" lamp. If everyone uses the same approach, the consumer may actually remember this number.

### **Mercury Label on Packages**

GE supports the concept of a National Mercury label for packages of Compact Fluorescent lamps, but does not agree with the specific mercury package label proposed by the FTC. We recommend the following changes:

#### **First Line:**

On the first line, place the Circle Hg first, then the statement Contains Mercury. Additionally on the first line, we also recommend the FTC require a mercury dose level of X.X which is consistent with European requirements for CFL's effective in late 2010. The first line of this Label would read:

**(Hg) Contains Mercury X.X mg**

#### **Second Line:**

The Second line should be shortened. The proposed statement is unnecessary long and redundant to state that products should be managed according to "local, state and federal" disposal laws. A shorter statement more likely to be read is:

**Manage According to Disposal Laws.**

The third line should be changed to use the industry website of [www.lamprecycle.org](http://www.lamprecycle.org). This website has been in use for 10 years and is well known. It is now receiving over 90,000 unique hits per year and has been recently redesigned to be very consumer friendly. At the very least, companies should have the option of using the industry website or the EPA website, as allowed under the current ENERGY STAR® program.

The phone number should be a company's 1-800 number. Consumers call 1-800 numbers for many different reasons, not just recycling information. Only if a company did not want to use their own 1-800 number, they should have the option of using the EPA number.

We also recommend that the term “for information” be changed more specifically to “For Clean-up and Disposal Information” which is the primary purpose of the website. We note that a website containing “Clean-up information” will also be required on CFL packaging per EU regulations by September 2010.

The final line should read:

**For Clean-Up and Disposal see: [www.lamprecycle.org](http://www.lamprecycle.org) or 1-800-company number.**

Summing all recommendations, the final recommended label would read:

**(Hg) Contains Mercury X.X mg  
Manage According to Disposal Laws.  
For Clean-Up and Disposal see: [www.lamprecycle.org](http://www.lamprecycle.org) or 1-800-xxx-xxxx**

### **Mercury Label on Products**

GE does not support the **product** mercury-labeling proposal for compact fluorescent lamps, but instead submits that marking with a circle Hg meets the spirit of the proposal – notifying the consumer about the fact that the lamp contains mercury.

Light bulbs are not like many other products, such as electronics. Most consumers purchase light bulb packages on a frequent basis. Many consumers purchase multi-packs, placing the extra bulbs in the pantry. A light bulb package is commonly available for reference, unlike a refrigerator or TV box. As all light bulb packages will contain a uniform label, the consumer does not have to have the original package or even the same brand package for reference. They can reference any light bulb package on hand. This makes extensive marking on the bulbs redundant and unnecessary to provide detailed mercury information.

The same light bulbs may be sold in different countries, requiring different languages. Requiring a lengthy marking on the product produces multiple problems for manufacturers if all relevant languages need to be printed on the bulb. This would necessitate an extensive and large area for printing. However, these products continue to shrink in size each year and have extremely limited space for any marking. For this reason, the industry agreed with the State of Vermont several years ago to simply place a circle-HG on the lamp, indicating that the lamp contains mercury. Additional detailed information on mercury is found on the package. Each character added takes precious space on the lamp base. There is no physical ability to place many additional characters on most lamps and certainly not enough room to place the statement “CONTAINS MERCURY. SEE [epa.gov/bulbrecycling](http://epa.gov/bulbrecycling) or 1-800-XXX-XXXX” on almost any lamp type made today, let alone in multiple languages. It is simply physically impossible. HG is the international symbol for mercury and requires no translation.

For these reasons, industry strongly urges FTC to mandate only the “HG in a circle” already in use today by many manufacturers as part of the product label.

Sincerely,

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