



December 28, 2009

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)

Dear Mr. Newsome,

On behalf of OSRAM SYLVANIA, one of the largest manufacturers of electric lamps in the U.S., we appreciate the opportunity to submit comments on the Federal Trade Commission's (FTC) Lamp Labeling Rule, Project Number P084206.

Many of our comments have already been incorporated into those sent today by the National Electrical Manufacturers Association (NEMA), which is the trade association representing the majority of U.S. lamp manufacturers. However, as those comments have indicated, there are some company differences of opinion regarding the front-of-package label that is being proposed by FTC. It is the purpose of this letter to outline OSRAM SYLVANIA's position regarding front-of-package labeling.

As indicated in the NEMA comments, all of the lamp manufacturers question the usefulness and long-term accuracy of the "estimated energy cost" disclosure destined for the package front panel. We have a suggestion to replace this proposed requirement, as outlined below:

Brightness and Energy

Based upon the FTC's own research with focus groups, the two key parameters of interest to consumers are "brightness" and "energy used." In other words, lumens and watts would seem to be proper candidates for the front of the package. We note, however, that in the summary of the focus group activity, FTC opined that consumer interest in energy use could be extended to mean "estimated energy cost." While this is an understandable opinion, we believe that the consumers meant what they said – namely,

that energy use (watts) is desired and expected as part of the mandatory labeling. To further support the inclusion of watts on the front-of-package labeling, we point out that for safety reasons, lighting fixtures are labeled with maximum wattage requirements. It seems to us that wattage should be included not only for “energy” reasons but also for safety reasons.

Regarding “brightness,” we agree with the FTC that a new labeling scheme can help us better educate the consumer regarding the true metric for light output – the lumen. We also believe that in order to better educate the consumer about this metric it needs to be more prominent than in the past. Prominence can be attained by position, font size, font boldness, or a combination

Before presenting our proposal, we would like to make further comment regarding the “lumens per watt” metric, about which FTC has inquired and asked for comment. This particular metric is of high interest to OSRAM SYLVANIA, and as you will see, is incorporated into our final suggestion for the front-of-package label.

Efficiency

The FTC has asked our opinion regarding inclusion of the lighting efficacy measure of “lumens per watt.” It is our opinion that LPW should ultimately become the preeminent lamp metric to use for general service lamps. Let us explain.

For years, consumers have been educated by the auto manufacturers regarding “miles per gallon,” or MPG. Virtually every consumer understands this metric and can see it prominently displayed on any new car side window. Consumers can compare across types and manufacturers with that single metric and can make an informed decision regarding “efficiency.” We contend that the same should be true for lamps, in that LPW is essentially the lighting equivalent of MPG. Even though the “lumen” is not a well known term to consumers, the “watt” certainly is, and the “lumen” could become well known if displayed properly – and if also combined it into a metric that will help them compare across lamp types and manufacturers for efficiency.

We believe we have an excellent opportunity to combine “brightness,” “energy use,” and “efficiency” together within the principle lighting panel to increase consumers’ overall understanding of how the terms inter-relate. In the revised principle panel example below, the panel is built in a relational table which displays the key variable; “Brightness” in large font, resting above a smaller set of cells which, in effect provide a greater understanding of the brightness to energy ratio. If so modified, the “Lumens,” “Wattage,” and “Lumens/Watt” panel can help educate the consumer in the long term; possibly reducing or eliminating the need some of this information’s predominance in the future as consumers become better educated and more comfortable with the meaning of the disclosures .

<u>Brightness</u> 1200 lumens	
<u>Energy Used</u> 20 watts	<u>Efficiency</u> 60 lumens / watt

We appreciate the opportunity to comment further on this important rulemaking.

Sincerely,

Pamela Horner, Director
Government and Industry Relations
OSRAM SYLVANIA, Inc.