



Minnesota Pollution Control Agency

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February 4, 2010

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

RE: Comments on Proposed Rule 16 C.F.R. Part 305 [RIN 3084-AB03] Appliance Labeling Rule

To Whom It May Concern:

The Minnesota Pollution Control Agency (MPCA), Prevention and Assistance Division, submits the following comments on the proposed federal rule 16 C.F.R Part 305 [RIN 3084-AB03] Appliance Labeling Rule as published in the Federal Register Vol. 74, No. 216, November 10, 2009 (74 FR 57950). We commend the Federal Trade Commission for bringing forth this important rulemaking and support many of the proposals.

The MPCA contributed to and supports the comments submitted by the Interstate Mercury Education and Reduction Clearinghouse (IMERC) and the Quicksilver Caucus (QSC). These comments focused on state labeling requirements for mercury-containing lamps and issues associated with mercury labeling.

As society makes major shifts in lighting technology and efficiency, the MPCA believes it is critical to address a number of additional environmental attributes or characteristics of lighting products in product and package labels. Specifically, we believe that lead content and power factor should be disclosed, at a minimum, on packaging and possibly also on products. Some manufacturers are already providing label or other disclosures related to these two items. The environment, manufacturers, and consumers would benefit from consistent disclosures so that manufacturers and consumers have incentives to manufacture, purchase, use, and properly recycle and/or dispose of the most environmentally advanced lighting technologies.

Lead content and labeling:

Historically, most lamps have contained lead, and some manufacturers are now reducing and eliminating lead, partly in response to European regulations. Manufacturers are also providing lead content disclosures. As an example, Feit has a lead disclosure label on its Eco-Bulb Plus CFL product packaging. A copy of this label is attached. You can see that Feit is making claims about the lead content of the glass and the circuitry. Feit also includes a package label stating that the product meets standards for Restriction of Hazardous Substances (RoHS). On their website, Feit does not appear to make a lead content statement or disclosure for this family of products. However, Feit does include a RoHS Compliant label or mark on the website. Currently, the product website is <http://www.ecobulbplus.com>

We recommend that the FTC require a lead disclosure for CFL, CCFL, and LED packages and products. Based on what Feit is currently doing, we recommend at a minimum that manufacturers disclose lead-free glass and lead-free circuitry on the package and 'lead-free' on the product. We recommend that FTC establish guidelines and possibly requirements for use of the RoHS Compliance mark as it relates to lead content.

Power Factor and labeling:

Power Factor is an important energy efficiency consideration from the perspective of electric power generation and transmission. CFL (and other) products with high power factor ratings contribute to overall electric grid efficiency. Several CFL manufacturers prominently address power factor on their product packaging and in their sales and specification literature.

For example, Energy Mad makes “Ecospiral” CFLs with high power factor, and the product package (copy attached) states “High Power Factor” without explanatory information. Their current website does include information on power factor. The home page is <http://www.ecobulb.com/us/index.html> and detailed information on power factor is provided here <http://www.ecobulb.com/us/Reasons.htm>

As another example, TCP manufactures several products with high power factor and discloses this information on its product technical sheets. For example, TCP’s 182, Dimmable 101 and Dimmable Pro Series products all have high power factor and this is disclosed on their respective specification sheets. The Dimmable Pro specification sheet also includes the RoHS Compliant label. The specification sheets can be accessed from this website: http://www.tcpi.com/commercial/lighting_products.aspx

Another company, PureSpectrum Lighting, manufactures CFLs and all of its products have high power factor. Power factor is discussed on this webpage and the fourth paragraph notes that all of the company’s products have high power factor:

<http://www.purespectrumlighting.com/technology/power-factor>

Cold Cathode compact fluorescent lamps (CCFL) are a different technology from conventional CFLs and all Cold Cathode lamps have high power factor as an inherent characteristic of the technology. Specification sheets for TCP’s CCFL line can be accessed from the website noted for TCP above.

We recommend that the FTC require a power factor disclosure for CFL and CCFL packages and products. Based on the disclosures already being made by some manufacturers, the FTC could require that lamp packaging include a power factor disclosure that clearly states whether the lamp has High Power Factor (HPF, >0.9) or Normal Power Factor (NPF, >0.5 typically), and that the base of CFL and CCFL products be labeled at minimum with “HPF” or “NPF.”

Thank you very much for your consideration of these comments.

Sincerely,

David J. Burke
Director
Prevention and Assistance Division

Attachments:

1. Feit EcoBulb Plus CFL package showing mercury and lead disclosures, RoHS Compliant disclosure and mark
2. Energy Mad Ecospiral CFL package showing “High Power Factor” disclosure

Federal Trade Commission

MPCA Comments on Proposed Appliance (Lamp) Labeling Rule (74 FR 57950)

Attachment 1: Feit EcoBulb Plus CFL package showing mercury and lead disclosures, RoHS Compliant disclosure and mark

FEIT ELECTRIC COMPANY

Pico Rivera, CA 90660
Made in China
www.feit.com

Order No. ESL13T/ECO



ECO BULB[®] PLUS
SOFTWHITE



60w
EQUIVALENT
USES ONLY 13 WATTS

SAVE \$56
vs. ENERGY STAR[®] CFL

9
LASTS UP TO YEARS*



- Lead-Free Glass
- Reduced Mercury Content
- Lead-Free PC Board Wave Soldering
- Lead-Free Solder at Base

THE ECOBULB[®] PLUS DIFFERENCE

All components that make up ECOBULB[®] PLUS CFLs are lead-free and mercury-free, tested to reduce/restrict mercury and lead content.

ECO BULB[®] PLUS
SOFTWHITE



60w
EQUIVALENT
USES ONLY 13 WATTS

9
LASTS UP TO YEARS*



SAVE \$56
vs. ENERGY STAR[®] CFL

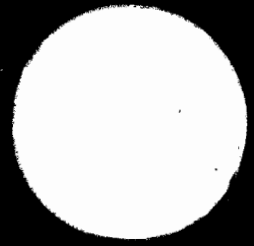
CFL LIGHTING FACTS 120V
LIGHT OUTPUT 900 Lumens
ENERGY USED 13 Watts

LIFE
10000 Hours



To save energy, use the bulb with the light output you need. Light Output is the same with the correct wattage.

SOFT WHITE
3500°K
SOFT WHITE BRIGHT WHITE DAYLIGHT



23W



one
ecospiral™



2700K
WARM WHITE LIGHT
ecospiral™
HIGH POWER FACTOR

LIGHT OUTPUT 1,650 LUMENS	ENERGY USED 23 WATTS	AVERAGE LIFE 10,000 HOURS
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- Use only on 120V, 60Hz circuits
- Suitable for recessed lighting
- Not suitable for dimmers or emergency exits
- Use enclosed fixtures for outdoor use
- Enclosed fixtures must have ventilation holes
- This product may cause interference with radios, cordless phones, televisions, and remote controls. If interference occurs, move this product away from the device and plug into a different outlet.
- To save energy costs, find the bulbs with the light output you need, then choose the one with the lowest watts.

Installation instructions: Hold the plastic base while installing, not the glass spiral. Increased weight of Ecospiral™ may reduce the stability of the luminaire.

Contains Mercury (Hg) less than 1.5mg
www.lamprecycle.org

