

## **Comments of the American Council for an Energy-Efficient Economy on the FTC Rulemaking Regarding Energy Use Labeling for Lamps (Lamp Labeling, Project No. P084206)**

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The American Council for an Energy-Efficient Economy (ACEEE) welcomes this opportunity to comment on the Federal Trade Commission (FTC) rulemaking to update lighting labeling requirements. Advancements in lighting technology, coupled with new minimum efficiency standards for general service incandescent lamps established by EISA 2007, will provide consumers with new and improved options for reducing the amount of energy they consume to light their homes. These changes may also result in significant consumer confusion as new products replace existing products that have been widely sold in their current form for decades.

The purpose of the FTC lighting label is to “enable consumers to select the most energy efficient lamps which meet their needs.” Revisions to the existing lighting labeling requirements are needed to help consumers make informed decisions when purchasing lighting products and minimize confusion resulting from the new selection of lighting technologies on the market. Our comments address the scope of the lighting labeling program, label design issues including required informational elements and format, and consumer research needs.

### **Scope of Coverage**

Current labeling requirements cover a limited range of lamp types. We encourage the FTC to expand the scope of the labeling program to cover the full range of lighting technologies, lamp shapes, and base types. The program should also have the flexibility to allow for coverage of new lighting technologies as they are introduced.

### **Informational Elements**

An effective lighting label must balance the necessary disclosures that will allow consumers to make informed purchasing decisions and the limited space available on the packaging of such a small product. We consider the following informational elements to be critical and encourage the FTC to make these disclosures mandatory.

Light output For decades, consumers have used lamp wattage as a proxy for light output. This was a reasonable method for matching light output to consumer needs when the market was dominated by a mature technology with products limited to a small and stable set of lamp wattages. As CFLs were introduced, manufacturers used “wattage equivalents” to help consumers relate the light output of the new product with the familiar incandescent lamp wattages. This has been a useful short-term tool, but as the range of lighting technologies available to consumers expands (e.g., high efficiency incandescent, halogen, CFL, and LED) and as the conventional products are eliminated from the market as a result of standards, lamp wattage no longer serves as a reasonable proxy for light output. Ideally, consumers will begin to select lighting products based on light output reported in lumens. This shift will take time—carefully crafted informational tools and educational efforts

will help. We recommend that the FTC lighting label emphasize lumens as the primary disclosure and that lamp lumens also be required on the lamp itself. In the near term, the lighting label should include a comparison of light output to conventional lamp wattages. However, the use of wattage equivalents should be a transitional measure to be phased out over time.

Efficiency Once consumers have identified products with the desired light output, they need information to help them select the most energy-efficient and cost-effective lamp available. We urge the FTC to consider adoption of a categorical rating system, preferably a stars-based rating, to assist consumers. Research in the U.S. (including extensive research conducted by ACEEE) and experience from around the world demonstrate the effectiveness of categorical labeling in informing consumers and motivating them to purchase the most-efficient products. Categorical ratings are particularly effective in helping consumers to identify the poorest performers and to distinguish differences at the lower and higher ends of the efficiency scale.

We support the categorical rating system developed by NRDC and Ecos Consulting. This approach incorporates a number of key elements: 1) equations relating light output to lamp efficacy; 2) a technology-neutral comparison on a single scale (allowing for technical improvements, incorporation of new technologies, and differences in performance within like technologies); 3) compatibility with the ENERGY STAR logo; 4) a simple and intuitive stars-based rating; and 5) a mechanism for updating the ratings through a collaborative stakeholder process.

Annual operating cost and lifetime Consumers need information on operating costs and expected lamp lifetime to help them select the most cost-effective products. We recommend that the FTC mandate disclosure of annual operating cost and product lifetime. Annual operating cost provides a meaningful value for consumer comparison of short- and long-lived lamps. Similar to the labeling program for appliances, FTC should establish a standard set of assumptions for calculation of operating cost including annual operating hours and average electricity prices. The specifics of these assumptions should be made available on the FTC website; the label should direct consumers to the website for more information.

Light quality/color Consumers have strong preferences and specific expectations for lamp color temperature. Meeting these expectations is critical if consumers are to embrace new lighting technologies. We believe that standardized descriptors corresponding to specific color temperature ranges should be developed and included as mandatory disclosures. The lighting industry is well-positioned to develop a consensus proposal for FTC consideration.

### **Label Format**

Lamp packages are small and we do not want to thwart manufacturers' efforts to reduce packaging waste with excessive or inflexible labeling requirements. The FTC should consider whether all of the required disclosures need to be contained within a single label "box" or if informational elements can be split between the front and side or back panels of the lamp package. At a minimum, we would recommend that light output serve as the primary descriptor on the front of the package along with an indication relating light output to its wattage equivalent in today's conventional products. We also encourage the FTC to establish requirements for both mandatory and discretionary disclosures. For example, minimum font size for mandatory disclosures, prominence for light output on the package front so that wattage cannot be printed in a larger font than lumens, etc.

### **Consumer Research**

A well designed lighting label will help consumers select the lamp that provides the desired amount and color of light, choose energy-efficient products, compare operating costs, and identify lamp life. We strongly urge the FTC to conduct research with consumers to identify the best ways to convey this information to consumers. Critical questions for consumer research include: 1) how to introduce light output as the key descriptor for lamp performance; 2) how to present wattage equivalents in a way that consumers understand now and that can support the transition away from the use of wattage as a proxy for light output; 3) how to group informational elements to help consumers find the information they need; and 4) how to present efficiency information so that it is easy to use, simple to understand, and motivating. Consumer research can also improve our understanding of interactions between mandatory label disclosures and the ENERGY STAR logo. We also encourage the FTC to

test actual consumer comprehension of various label elements and designs rather than relying on consumer preferences.

We appreciate the opportunity to participate in the FTC's proceeding to improve the effectiveness of lighting labels. We look forward to further discussions of specific label content and designs as the rulemaking progresses and are particularly interested in providing input into consumer research to identify the most effective labeling approaches. Well-designed lighting labels will assist consumers in making the transition to more efficient lighting technologies and result in significant energy and dollar savings with benefits throughout the economy.