



September 29, 2008

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

Dear Mr. Newsome:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments on the Lamp Labeling, Project Number P084206, announced by Federal Trade Commission on July 17th, 2008. The comments were developed by the CEE Lighting Committee (Committee). The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

General Comments

As CEE understands it, the purpose of lamp labeling is to provide the consumer with accurate information by which they can compare products. As such, we believe it is important to maintain a level playing field between technologies and strongly recommend that the FTC include all lamp types and technologies under the labeling requirements, including incandescent, LEDs, candelabra based lamps, and GU-24 based lamps. In addition, we would like the label requirements to be applied to all products sold, not just those that are sold through retail channels. (Some lamps are sold directly to large customers or through efficiency programs and these should also be labeled.) CEE also strongly recommends that market research be conducted on all aspects of the label to ensure that the information on the label and the format used are effective at communicating information about energy use and light quality to consumers.

Light Output

CEE recommends that, in the near term, both light output in terms of lumens and lamp power in terms of wattage be communicated on the label. Due to the prevalence of incandescent lamps in the marketplace, it is logical to assume that most consumers select the light output of a lamp based on its wattage. Until this practice changes, we recommend the inclusion of a wattage equivalency (on the label that would communicate the lamp's light output compared to traditional incandescent technology, e.g., a 13 Watt CFL produces equivalent light to a 60 Watt incandescent. CEE recommends the FTC consider the incandescent wattage equivalencies cited in the ENERGY STAR CFL specification as a starting point in its consideration of this matter. In its research, we encourage the FTC to study the best way to transition consumers from using watts to describe brightness to using lumens, as we believe that maintaining the use of incandescent watts as a benchmark for light output will become very complicated as new technologies are brought to market.

Efficiency

In the Advanced Notice of Proposed Rulemaking, the FTC sought input on the inclusion of an efficiency rating on the label, such as a lumens/watt rating or a categorical descriptor of efficiency. CEE supports use of an efficiency rating on the label that will easily communicate the efficiency of a lamp to the consumer. As we have stated in past comments on the revision of the EnergyGuide label, CEE is particularly interested in how categorical labels, such as the label proposed by NRDC, would interact with the current ENERGY STAR label and recommend that this be researched further before any decisions are made.

Operating Cost

CEE is supportive of requiring operating cost to be on the label. Several CEE member efficiency programs have noted some consumer confusion arising from operating cost labels, which leads us to conclude that information on operating cost is most beneficial when consumers use it as a tool for comparison, not as a predictor of their own energy costs. To minimize this confusion, we suggest that the label indicate that the operating cost doesn't necessarily reflect the actual electricity rates in a consumer's service territory. We encourage the FTC to conduct research to determine the best way to communicate this to consumers, whether it is through a title such as "Nationally Averaged Operating Cost" or a footnote stating "Your cost will depend on your utility rates and use." To achieve relative consistency, it is important that all manufacturers use the same assumptions to calculate operating cost and we urge FTC to standardize these accordingly.

Lifetime

CEE is in favor of continuing to require lifetime information on lamp packaging. In particular, we recommend that lifetime be communicated in hours (rather than years) to avoid additional calculations and discrepancies based on actual usage. If research indicates that lifetime measured in years is preferred by the consumer, then all manufacturers should be required to use standard assumptions when performing their calculations.

Light Quality

CEE supports requiring the color of the lamp to be indicated on packaging and suggests that the FTC first explore using terminology common in the lighting industry for the different color temperatures: 2700K (soft white), 3000K (warm white), 3500K (white), 4100K (cool white), 5000K (natural) and 6500K (daylight). Again, we recommend that these terms be researched to ensure that color descriptors, as opposed to symbols for example, are the best way to communicate color to consumers.

Format

Because we believe that the format of the label can significantly impact how consumers read and interpret the information, CEE recommends that many different formats be market tested. We are supportive of standardizing the location, font, and size of the required information because we believe this will help condition consumers to find specific facts and compare across products and manufacturers. Further, experience from

member efficiency programs has shown that simpler formats are more readily understood and therefore we recommend the FTC use a simple format as a starting point in its research.

We appreciate that packaging space is limited and that manufacturers may need to use the side or back of packaging to accommodate all of the required information. We believe that consumers will benefit from having some standard information on the front of packaging and encourage the FTC to require lumens, watts, and color information be provided on the front of the packaging. Further, given our opinion of the importance of informing consumers about light output in terms of lumens, we believe lumens should be displayed in a larger font than watts.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 589-3949 ext. 203 with any questions.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

Alliance to Save Energy
Avista Utilities
BC Hydro
Efficiency Vermont
Long Island Power Authority
New Jersey Clean Energy Program
Northeast Energy Efficiency Partnerships
NSTAR
Pacific Gas & Electric
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