



March 23, 2009

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 proposed collection of information announced by Federal Trade Commission on February 20, 2009. The comments were developed by the CEE Lighting and Evaluation Committees (Committee). The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE strongly supports the proposed consumer study and believes it is necessary 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. CEE also has some suggestions on ways to enhance the quality, utility, and clarity of the information to be collected, which are detailed below.

Sampling and Analysis Plans

The description in the Federal Register notice did not explain the plans for selection of the roughly 15,000 respondents expected to receive the screener questions. CEE strongly suggests that the initial respondents be randomly sampled from the internet panel to reduce sample bias and allow for statistical comparisons between subgroups.

It is likely that demographic characteristics such as education, age, or language spoken in the home will be important factors in label understanding. In developing the sampling plan, CEE urges FTC to consider dividing the sample into subpopulations based on key demographic characteristics and randomly sampling from these subpopulations (stratifying the sample). This will ensure that it will be possible to compare label understanding by key characteristics.

It is important to ensure that the survey can assess the effectiveness of the label treatments at communicating effectively with different subgroups in the population, such as those populations for whom English is not the first language. In the case of this subgroup spoken in the home, CEE suggests that FTC explore the possibility of administering a smaller, parallel data collection effort to a separate Internet panel, for example, comprised of respondents who do not speak English at home, such as a panel of Spanish speakers (According to the U.S. Census Bureau, more than 12 percent of

Americans over the age of five live in Spanish-speaking households, and of these, nearly half speak English less than "very well.")

Survey Instrument

It is unclear from the description in the Federal Register the extent to which FTC plans to include in the survey instrument questions designed to assess understanding at the level of each individual element included on the label independent of the other characteristics shown on the labels (for example, comparing light output in lumens directly against light output in wattage, without showing other label elements at the same time). Given the large number of potential label combinations, without separate questions to compare understanding of specific elements of the label it will be extremely difficult to control variation across label treatments enough to pinpoint the most effective way to communicate each of the descriptors outlined in Table 1 of the Federal Register notice.

As a result, CEE strongly recommends that the FTC include questions designed to compare respondent understanding of each of the descriptors separately. Coordinating these questions carefully with the 15-20 label treatments chosen for testing should help in keeping down the number of questions that need to be asked of each respondent.

How the 15 to 20 label treatments used in the questionnaire will be chosen was not discussed in the Federal Register notice. Given the large number of potential label combinations, CEE has two suggestions for the FTC to consider as it decides this question. First, CEE recommends that FTC select combinations of labels that will allow for robust testing of understanding of the effects of different locations and descriptors. Second, CEE suggests that the FTC consider the possibility of using focus group(s) to help narrow down combinations for use in the questionnaire.

In addition, the order in which treatments are shown can have an effect on the survey results.¹ If respondents are shown more than one label treatment, CEE recommends that the treatments be shown in random order.

CEE is aware that Natural Resources Canada (NRCan) is in the process of completing research on lighting labeling. Due to the fact that different labeling requirements in the United States and Canada are likely to pose additional costs to manufacturers, CEE generally encourages the FTC and NRCan to work toward consistent labeling requirements. Specifically, CEE recommends the FTC obtain research results from Canada and consider these before finalizing its own research plans.

Information on the Label

Based on the experience gained through administering efficiency programs, CEE agrees with the FTC's articulation in the Federal Register notice that the most important pieces of information that should be tested in this study are lamp brightness, energy use, color temperature, and lamp life. While these are the primary facts likely to be important in consumer decision making about lamp purchases, CEE members' program experience also indicates other information may be useful as well. CEE encourages the FTC to

¹ Dillman, Don. A. 2000. *Mail and Internet Surveys*. New York: John Wiley & Sons.

research the relative importance in the decision making process of the color rendering index (CRI), dimmability, end of life disposal, and lamp directionality (relative in terms of cost to complete the research, expense to the manufacturer, and value added to the consumer).

Format of the Label

As we have stated in previous comments, CEE supports standardizing the location, font, and size of the required information on lamp packaging because we believe this will help condition consumers to look for these facts and compare lamp characteristics across products and manufacturers. As a result, we recommend that the format of the label is taken into consideration as part of the consumer study.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 337-9263 with any questions.

Sincerely,

Marc Hoffman
Executive Director

Supporting Organizations

Cape Light Compact
Commonwealth Edison
Efficiency Vermont
National Grid
New York State Research and Development Authority
Northeast Energy Efficiency Partnerships
NSTAR
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