

Recently, I have been considering the purchase of a new plasma/LCD TV and heard a story on my local Connecticut public radio station concerning the wide-range of energy usage between various new TV models. This was somewhat of a surprise to me - since I thought that all TVs were fairly uniform in terms of energy usage. In response, I tried comparing various models at a national retailer in terms of retail price and energy usage. I could not find any TV models with energy cost/usage information in the product or store advertising - despite the fact that I could walk a few feet to another isle and find other appliances such as refrigerators that had energy information including the use of the Energy Star program logo – an important logo in my past buying decisions.

I am writing as a concerned citizen concerning the FTC's proposed rule for disclosure and labeling of energy cost/consumption on televisions sold to the public. As the Commission has recognized, modern televisions use as much, or more, electricity than products, which are currently required to be labeled under the existing rule. There seems little reason to require labels on refrigerators, for example, and not require labeling of televisions when energy consumption of modern TVs has changed significantly since the 1970s when the original rule was developed.

The Commission is to be commended for writing the proposed rule! As written, the proposed rule appears to balance the needs of industry while providing consumers with meaningful information on energy usage/cost. Such information is needed in order to help consumers like me make informed buying choices. Although the proposed rule is excellent, I would ask the Commission to consider the following additional comments:

**(1) Opposition to CEA’s Suggestion to Remove Comparison Information.**

I would urge the Commission to continue to resist any efforts from industry to remove comparison information from the final rule. I note that the Commission previously received comments from the Consumer Electronics Association (CEA) to delete comparative information from the required labeling. Deletion of such information is not in the public interest since it would take away information I would want to see as a consumer. The final rule should include the comparison information the Commission has included in the proposed rule. Additionally, the final rule should include the evaluation standards and labeling requirements as written in the proposed rule, including the use of the Energy Star program standards and labeling as written in the proposed rule. The proposed rule’s use of these methods will help consumers to make informed buying decisions since such information is already provided for other appliances which consumers buy today.

**(2) Optional Green Color Type for the Numbers and Text Showing the “Estimated Yearly Energy Cost” for Energy Star Approved Products.**

Under §305.17(c) the proposed rule requires “all type and graphics shall be printed process black.” I would urge the Commission to allow (as an option) industry to print the information concerning estimated yearly energy cost in green color type on Television labeling if the product to be labeled also qualifies as an approved “Energy Star” product. The color type would help (along with the Energy Star labels) to identify energy-efficient TVs. Such visual marketing

would have the tendency of making more efficient models stand out in row of comparable models. This would help consumers quickly compare TV models in terms of retail price, energy efficiency and picture quality. Since such color printing would be at the option of the industry, it would not have any negative effective on manufacturers or retailers in terms of additional cost compared to the proposed rule.

**(3) Clarify §305.20(g) by Inserting the words “Paper or Online” modifying Catalog**

It is clear that the Commission intends that the requirements of §305.20 apply equally to paper or online catalogs based on the Commission’s commentary and the title of the section in the proposed rule. I would urge the Commission to review the text of §305.20 (g) to clarify this intent. The language of this section currently requires “*Any manufacturer, distributor, retailer, or private labeler who advertises televisions in a catalog shall include in such catalog either . . .*” Although the title of this section includes the word “online,” the text of the rule only refers to the term catalog. The text could be improved by directly addressing online catalogs in the text of the rule. A possible revision might read: “*Any manufacturer, distributor, retailer, or private labeler who advertises televisions **online or in paper shall include in its catalog either . . .***”

I appreciate the opportunity to comment. Thank you for your consideration.