



KYLE PITSOR

Vice President, Government Relations

December 04, 2017

ONLINE VIA: <https://ftcpublishcommentworks.com/ftc/labelranges/>

Mr. Hampton Newsome
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
Room CC-9528, 600
Pennsylvania Avenue NW.
Washington, DC 20580

Regulatory Information Number: 3084-AB15

Dear Mr. Newsome,

As the leading trade association representing the manufacturers of electrical and medical imaging equipment, the National Electrical Manufacturers Association (NEMA) provides the attached comments on the Department of Energy Request for Information regarding the FTC's Energy Labeling Rule. These comments are submitted on behalf of NEMA Light Source Section Member companies.

NEMA, founded in 1926 and headquartered in Arlington, Virginia, represents nearly 350 manufacturers of electrical equipment and medical imaging technologies. Our combined industries account for more than 360,000 American jobs and more than 7,000 facilities across the United States. Domestic production exceeds \$106 billion per year and exports top \$36 billion.

Regarding the proposed changes to 16 CFR clause 305.10, with respect to their mention of labeling requirements for lamps, NEMA agrees with this proposal. The remaining portions of the NOPR are outside of the scope of NEMA products, and as such we refrain from comment on those.

If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

Kyle Pitsor
Vice President, Government Relations
National Electrical Manufacturers Association