

Postings: from the desk of Jim Brodrick

Hello everyone. I'm back from a week off. I hope that all of you had a great Thanksgiving Day, despite the terrible football games.

My topic for this week is the Federal Trade Commission proposal of a new labeling format for medium screw-based light bulbs. In response to a Congressional mandate, the FTC has proposed replacing the existing label, which was originally intended only for incandescent lamps, with a new label that would better represent more energy-efficient technologies like CFLs and LEDs. The Notice of Proposed Rulemaking for this new label may be found at <http://edocket.access.gpo.gov/2009/pdf/E9-27036.pdf>. If you have comments for the FTC, they must be received no later than December 28, 2009. Instructions on filing comments are provided on the FTC web site.

As part of the Energy Independence and Security Act of 2007, the Commission was asked to consider the "effectiveness of current bulb labeling requirements and explore alternative labeling approaches." With the advent of so many new, more energy-efficient technologies finding their way into the marketplace, the Commission decided to act and propose a new, more universal label. If ultimately approved for public use by the Commission, it is believed that the label would be a mandatory requirement sometime in 2011.

For the past year and a half, DOE has been working with the FTC on a concept for the label. After much review and public comment, the FTC has decided to propose a label very much akin to DOE's Lighting Facts label. In actuality, the FTC is proposing to use the "Lighting Facts" moniker. The use of the name Lighting Facts has my full support and we will continue to work closely with the FTC as it responds to the latest public comment process.

It should be clearly stated that the proposed FTC label only includes medium screw-based replacement lamps, and does not cover other replacement lamps, such as pin-based, nor does it cover lighting fixtures with integral lamps. In addition, the FTC label is currently

intended to solely function as a “truth in advertising” label in the same manner that the DOE Lighting Facts label is intended to function. This means that the new FTC label is not intended as a “qualitative” label and as such will not be competition for the ENERGY STAR Program.

Since the FTC label has a limited application, FTC staff has asked DOE to continue with its Lighting Facts label for non-screw-based LED replacement lamps and for LED luminaires. As I have stated in past Postings, the DOE Lighting Facts label has become a very important part of the LED lighting fabric as it provides buyers with a sound basis for selecting products based on a nationally-recognized test procedure. It is fully my intention to continue with Lighting Facts for those products not covered by the FTC, and to work with the FTC to assure that its label provides the same type of buyer comfort.

For those of you in the lighting industry that might be affected by the FTC labeling mandate, it would do you well to at least read the proposal and to comment if there are concerns that should be aired.

As always, if you have questions or comments, you can reach me at postings@lightingfacts.com.

James R. Brodrick
