

Email received on January 5, 2010 from Alan P. Huoni.

To Environmental Protection Agency and Department of Energy:

Initial Note: The Defense Commissary Agency is a retail partner in the ENERGYSTAR program and in regards to product sales focuses on energy saving bulbs and is precluded by charter from selling many of the other ENERGYSTAR products - i.e. washers, refrigerators etc. and thus our comments are restricted to the second new proposal entitled "ENERGY STAR Qualified Lighting - An Integration Proposal Package".

The Defense Commissary Agency as an ENERGYSTAR Partner Retailer and overall supporter of responsible environmental initiatives is supportive of the new ENERGYSTAR Program enhancements outlined in the "ENERGY STAR Qualified Lighting - An Integration Proposal Package". We are confident that the scientific, engineering, and economic analysis of bulb characteristics will be done properly. Our primary concern is in the labeling and marketing of the new products to customers.

We believe much effort must be expended to develop a straightforward technique that is market tested to ensure customers are not confused with all the choices available to them and so that new lighting products can be properly integrated into home usage. Something similar to the simplified food nutrition label to outline the various attributes - life expectancy, light output, type of light (white - soft white), best usage type, mercury content etc. may be in order. Without a standardized way of communicating the characteristics of the bulbs, customers may not be able to compare. Perhaps input from consumer focused organizations may be useful in this regard.

The education of customers will be the key as will proper incentive and marketing programs. As a seller of bulbs we work to voice customer concerns that we want to do everything to ensure customers are satisfied with their purchases and not disappointed that bulbs don't look or work right for the application for which they are using them.

We anticipate questions on such topics as should consumers (and governmental programs - i.e. Operation Changeout) now dispose of CFL's prior to their life expectancy as was the case with incandescent bulbs?

This poses greater impacts with Mercury issues than with the change-out of incandescent bulbs. In this vein the overall cost and environmental footprint (of bulb and energy usage) must be considered.

Thank you very much,

Alan P. Huoni

Special Projects  
Product Support  
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