



Michael J. McCabe
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Dear Michael McCabe,

I am writing this letter to comment on DOE's third draft of the Version 3.0 specification for compact fluorescent light bulbs (CFLs). I want to highlight a number of improvements to the specification that EPA believes will serve to further improve the quality of ENERGY STAR qualified CFL products and reduce consumer confusion. I also want to identify a number of elements in this draft specification that remain of concern to EPA. For these, I outline alternative approaches that would likely serve the manufacturer partners, consumers, and other stakeholders more successfully.

First, I believe that the third draft of your Version 3.0 specification adopts some important changes. In particular, I support the elimination of "prequalification" and the addition of a requirement that lumen maintenance test results be submitted before any ENERGY STAR qualification is allowed. These changes, together with the fact that the rapid cycle stress test continues to be a requirement, promises to greatly enhance your ability to exclude product that fails prematurely, perhaps the single largest consumer confidence issue for CFLs. Similarly, I believe that raising the warranty requirement from one to two years will promote enhanced product quality as well as add an important level of consistency with the ENERGY STAR residential light fixture specification. Finally, I believe that including a standardized CFL/incandescent equivalency table as part of the labeling requirement is responsive to the market barriers preventing broader use of CFLs and will aid consumers in their selection of the appropriate CFL for their home.

My concerns fall into two broad areas, DOE's proposal to address the color variability of CFLs and DOE's new package labeling requirements. I believe that DOE's proposals in each area place unnecessary burden on the manufacturers without delivering the intended benefit. They may actually serve to further confuse consumers as opposed to assist them.

I am particularly concerned about DOE's approach for incrementally improving CFL color consistency. In the third draft of the Version 3.0 CFL specification, DOE proposes to require that manufacturers test and label their CFL models based on particular Color Correlated Temperature (CCT) ranges, as a basis for enhanced consumer information on bulb color. Research results of the Lighting Research Center (LRC) shows no clear relationship between the CCT and the color appearance of a CFL, as the CCT was developed to describe color only in the narrow band of color space in which incandescent bulbs operate, a band most CFLs fall outside of. In addition, the DOE proposal to take the average of the CCT values across 10 samples of a particular model and to record that average value on the product package has no consumer

assistance value whatsoever. The average of a set of numbers frequently says very little about any one of those numbers. I strongly urge DOE to eliminate changes to the CCT requirement as currently proposed and proceed aggressively to develop and implement a complete solution that addresses both CFL color consistency problems and the way color is communicated to consumers.

I am also concerned about the broad new list of labeling requirements. These requirements will impose a cost on the manufacturers and a cost on the government (for review) while offering no clearly identifiable benefit. There is no supporting research demonstrating that the required labeling will effectively address important consumer issues. To the contrary, recently completed LRC consumer research seems to indicate that consumers are not relying on the technical information contained on CFL packaging to make their purchase selections. Adding more technical specifications to the package may, therefore, be an ineffective approach. I question whether requiring standardized estimation and labeling of lamp life offers anything of added value to consumers, given that consumers care most about very premature failure. I also question whether it is an appropriate role for ENERGY STAR to dictate that manufacturers declare the mercury content of their products, since mercury content has no bearing on the products qualification.

I am also concerned about the implementation of the new labeling requirements. It seems that the bulk of the CFL bulbs on the market would remain qualified under the current specification and that only “new entrants” would be subject to the new labeling requirements. If these new labeling requirements are not viewed by consumers as value added across the board (and think about the mercury statement), these new entrants (which have undergone more rigorous testing and should be viewed as offering some greater consumer benefits) will actually be viewed negatively by consumers. Due to the difficulty of ascertaining how this labeling would be perceived in the marketplace, I strongly urge DOE to delay the effective date of the labeling requirement to a point when it can be required uniformly across all the qualifying product.

On an editorial level, you should remove the reference to ENERGY STAR-approved laboratories.

In closing, I would like to reiterate our commitment to working with DOE to improve the quality of and consumers’ experience with CFLs. In the near term, I believe this shared goal would be best served by eliminating most of the proposed new labeling requirements, having the refined labeling requirement apply to all bulbs as of an appropriate future date, and leaving the color issue to be addressed in a future revision.

Sincerely,

/signature/

Kathleen Hogan, Director
Climate Protection Partnerships Division