

**CE Lighting of North America Inc.**

#68, 40 Vogell Road,  
Richmond Hill, Ontario  
L4B 3N6, Canada.

We noticed that DOE is going to stop the Early Labeling rules with this revision. We'd like to send in our comments on this issue as below.

1. The abandon of Early Labeling will also force the CFL manufacturers, for the sake of saving time for marketing lamps, to only produce the minimum required 6000-hour lamps while they are capable of making longer life lamps. That will not only discourages manufacturers to develop new technologies but also cause a drawback in energy efficient technology. It is also not in accordance with Energy Star's initial goals in encouraging the development of more energy efficient products.

2. Even if the manufacturers don't use the above time-saving way, the abandon of Early Labeling will still significantly delay any new technology into practice and thus waste significant time for the consumers or end-users to get more benefits from the use of more energy saving lamps. This is also against Energy Star's initial goals in promoting more energy efficient products.

3. From the CFL marketers' point of view, the abandon of Early Labeling will significantly limit the freedom in selling any new better lamps because, for instance, it is almost not practical to make any business plan to sell a 10,000-hours rated lamps one and half year later.

Being both a CFL manufacturer and a CFL marketer, we strongly suggest DOE to keep the existing Early Labeling rules.