

**Comments on ENERGY STAR® Program Requirements for CFLs  
Submitted by Idaho Power Company**

1. Require manufacturers to list Kelvin on the package and the ballast. In addition, consider making the 'soft white' Kelvin range smaller than proposed. Customers currently struggle a lot with color selection. In addition, they are very particular in this area with little knowledge of how to select bulbs in the color range they like. Not only do they not know what to look for but also the various 'white' options are not performing to their expectations.
2. Develop new packaging requirements to eliminate ENERGY STAR/non-ENERGY STAR confusion, particularly with products under the same brand. Simple placement of the ES logo does not seem to be sufficient. When manufacturers rely on strong colors and graphics to set apart their brand, the ENERGY STAR logo gets lost on the package. If their product line includes ENERGY STAR/non-ENERGY STAR bulbs, customers are often confused and assume that the entire brand qualifies. Either require manufacturers to qualify their entire product line under any given brand or increase the packaging requirements.
3. A run-up time of up to 3.00 minutes seems too long. It would seem that if 3.00 minutes is required that at least some parameter should be in place to ensure that 90% of the run-up is complete within 90 seconds. Customers want 'instant-on' and expect the better bulbs to perform closer to that standard.
4. Tighten up the testing protocol for Average Rated Lamp Life. Customers continue to complain about early burn out. They seem unclear that they can get a replacement bulb. Perhaps the warranty statement requirements will help but few customers keep the package. Better yet, require the 800-number to be directly on the ballast.
5. Consider adding new requirement to manufacture bulbs using 75% recycled mercury. In addition, require a smaller percentage to come from lamp recycling or mercury recycled from residential sources. Normally, disposal of fluorescent and CFL lamps would be regulated under EPA's Universal Waste Rules or Hazardous Waste Rules. However, the main users of CFLs are homeowners and are therefore exempt from these federal rules. It is very difficult to keep CFLs out of landfills and their associated mercury out of the environment. In the recycling models from the Zero Waste Alliance there is a common fundamental error. In virtually all the models the so-called recycling is paid for up-front as a disposal charge. Very little of the "recycler's" revenue actually come from sale of the recycled materials. The unfortunate fact is that virgin mercury is readily available and cheap on the world market. Until a market advantage can be created for recycled mercury, this situation won't change. Even if a market for recycled mercury emerges, CFLs contain such a small quantity of mercury in comparison to thermometers, mercury switches and industrial sources that CFL recycling will not become profitable.