



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

April 19, 2007

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex A)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Appliance Labeling Amendments, R511994

Thank you for the opportunity to comment on the FTC's proposal to amend the requirements of the Appliance Labeling rule. EPA is supportive of FTC's decision to develop a modified version of the current Energy Guide label rather than creating a revised a categorical, five-star label.

We concur that the results of FTC research suggest that a categorical label presents some significant concerns with regard to ENERGY STAR and that consumers were much more likely to exhibit confusion in identifying ENERGY STAR products when using the categorical label. We also concur with FTC findings that a categorical label "may tend to convey inaccurate product quality messages more often than other tested designs. These concerns outweigh the categorical designs potential benefits."

Regarding the size and placement of the ENERGY STAR logo on qualifying products in the new label design, we appreciate that in the proposed rule, the logo's position has been moved from its current location on the comparative energy use scale, which is potentially confusing to consumers. We think that the proposed logo size of one inch by one inch is the minimum effective size for use of the ENERGY STAR logo for qualifying products on the EnergyGuide label, and would be supportive of any additional modifications to the EnergyGuide labeling requirements that would improve the prominence and visibility of the ENERGY STAR logo without undermining the general purpose of the EnergyGuide label.

Regarding FTC interest in further considering an EnergyGuide labeling requirement for televisions, EPA has been working closely with the International Electrotechnical Commission (IEC) to develop a test procedure that accurately and fairly measures active mode power consumption of televisions, irrespective of technology. The IEC undertook this effort based on considerable interest from the United States and abroad in the development of an internationally accredited test procedure for measuring television

power consumption. IEC has shared their draft standard with EPA and ENERGY STAR stakeholders in advance of official publication to facilitate evaluation and testing of power consumption and to help inform development of revised ENERGY STAR performance criteria. To the extent that FTC moves forward with an EnergyGuide requirement for this product category, we encourage reliance on the final IEC standard test procedure as a basis.

In conclusion, as noted in the Federal Register Proposed Rules, we agree that “the relationship between the FTC EnergyGuide label and ENERGY STAR provide a robust source of energy efficiency information to consumers” with the “FTC label displaying detailed energy information about all products regardless of energy efficiency and ENERGY STAR serving as the U.S. Government’s imprimatur for high energy efficiency products.”

Thank you for your continued efforts to ensure that the ENERGY STAR and the FTC EnergyGuide label work together to provide complementary information that helps consumers make informed choices about the energy efficiency of the appliances they purchase.

Sincerely,

Ann Bailey, Chief
ENERGY STAR Product Labeling
Branch