



HAWAII STATE ENERGY OFFICE STATE OF HAWAII

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Testimony of
MARK B. GLICK, Chief Energy Officer

before the
SENATE COMMITTEE ON COMMERCE AND CONSUMER PROTECTION

Tuesday, February 21, 2023
10:00 AM
State Capitol, Conference Room 229 and Videoconference

In Support of
SB 690, SD1

RELATING TO ENERGY EFFICIENCY.

Chair Keohokalole, Vice Chair Fukunaga, and Members of the Committee, the Hawaii State Energy Office (HSEO) supports the adoption of SB 690, SD1, which prohibits the sale of common fluorescent lamps while exempting certain specialty lamps.

HSEO's testimony is guided by its mission to promote energy efficiency, renewable energy, and clean transportation to help achieve a resilient, clean energy, decarbonized economy.

The attached summary sheet from the Appliance Standards Awareness Project summarizes estimated benefits of adopting this bill. In addition to avoiding the dumping of inefficient lamps in Hawai'i from other locations that have banned these products, the bill is projected to reduce Hawai'i consumers' electricity bills by \$37 million annually by 2030, eliminate the production of 756,000 tons of CO2 by 2050, and avoid the production of 36 pounds of mercury (sufficient to contaminate 1.8 billion gallons of drinking water).

Thank you for the opportunity to testify on this bill.

Hawaii Can Protect Health and Lower Energy Bills by Phasing Out Fluorescent Light Bulbs

FACT SHEET | JANUARY 2023

Fluorescent lights are a common sight in offices, garages, and basements—but they contain toxic mercury and use far more energy than newer alternatives. By phasing out fluorescents in favor of efficient LED bulbs, Hawaii can avert a needless health risk, save families and business money on utility bills, and curb greenhouse gas emissions.

Fluorescent lighting was once the preferred option for many uses, but not anymore. LED light bulbs—readily available as replacements for fluorescents in all needed shapes and sizes—do not contain any of the toxic mercury that fluorescent bulbs do. They also cut energy use in half compared to fluorescents, last about twice as long, and typically cost far less to purchase and operate over their lifetime. So why are fluorescents still on store shelves?

In 2022, Vermont and California became the first states to phase out the sale of most fluorescent bulbs. As other states move to eliminate fluorescents, Hawaii risks becoming a dumping ground for inefficient, mercury-containing bulbs that suppliers cannot sell elsewhere. Hawaii lawmakers should take prompt action to phase out sales of the most common fluorescent bulbs by 2025.

REDUCE THE THREAT OF MERCURY EXPOSURE

All fluorescent bulbs contain mercury, a potent neurotoxin that threatens human health and the environment. The World Health Organization counts mercury among the top 10 most dangerous chemicals impacting public health.

When fluorescent bulbs are accidentally broken—whether in homes, businesses, or the waste management system—they present a health hazard to those nearby. And when fluorescent bulbs are not disposed of properly—as happens with an estimated 75% of bulbs—mercury can leach from landfills and eventually contaminate waterways and the fish and shellfish within them.

LEDs, which are mercury-free, are a much safer option. Technological advancements in recent years have made them readily available and cost effective.



By transitioning from
the most common
fluorescent bulbs to
LEDs, Hawaii could avoid

36 pounds

of mercury waste,
enough to contaminate
1.8 billion gallons of
water.



By 2030, Hawaii households and businesses would save more than **\$37 million annually** on their utility bills.

SAVE MONEY ON ELECTRIC BILLS

Fluorescent bulbs are [no longer the most affordable lighting option](#). Because they are more energy efficient than fluorescents, LEDs cost less to operate, more than paying back their slightly higher upfront costs—which continue to drop each year—through lower electric bills. A typical school could see more than \$5,000 in annual utility bill savings if all its fluorescent bulbs were replaced with LEDs.

LEDs also last about twice as long as fluorescents, so they need to be replaced less often. And because LEDs do not contain mercury, a hazardous waste, they can be disposed of more easily and cheaply than fluorescents when the time comes.

AVERT NEEDLESS GREENHOUSE GAS EMISSIONS

LEDs use approximately half the electricity as fluorescent bulbs to produce the same amount of light. As a result, accelerating the transition to LEDs can reduce planet-warming emissions from power plants and help prevent the worst effects of climate change.

HAWAII LAWMAKERS CAN PHASE OUT FLUORESCENTS

24 states around the country already regulate mercury-containing products, including fluorescent light bulbs, because of their toxic nature. Lawmakers could continue this effort and protect Hawaii from mercury pollution by ensuring a transition from fluorescents to LEDs.



By 2050, Hawaii could avoid the release of **756,000 metric tons** of carbon dioxide per year, the equivalent of **162,000 gasoline-powered passenger vehicles driven for one year.**



A BILL FOR AN ACT

RELATING TO ENERGY EFFICIENCY.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF HAWAII:

1 SECTION 1. The legislature finds that there have been many
2 advances in the energy efficiency of lighting. Fluorescent
3 bulbs were promoted in the 1980s because they are up to thirty-
4 five per cent more energy efficient than the incandescent light
5 fixtures widely in use at that time; however, further advances
6 have been made with light-emitting diodes (LEDs) that are now up
7 to eighty per cent more energy efficient than fluorescent bulbs
8 and can last three to five times longer than fluorescent bulbs
9 and thirty times longer than incandescent bulbs.

10 The legislature further finds that all fluorescent bulbs
11 contain mercury, a toxic pollutant that bioaccumulates in the
12 environment, can pollute air and water, and causes harm to
13 wildlife and human health. The legislature notes that mercury-
14 free alternatives exist for most of the thousands of products
15 that contain mercury components.

16 The legislature believes that LEDs are a better alternative
17 because they do not contain any mercury, are more energy



1 efficient, and are the cheaper life-cycle cost lighting option
2 for consumers and businesses. Phasing out the sale of mercury-
3 containing bulbs in Hawaii will prevent additional toxic
4 pollutants from being brought into the State's ecosystem, reduce
5 energy use, and save consumer dollars.

6 Accordingly, the purpose of this Act is to prohibit the
7 sale of certain fluorescent lamps in the State as a new
8 manufactured product, with certain exemptions.

9 SECTION 2. Chapter 196, Hawaii Revised Statutes, is
10 amended by adding a new part to be appropriately designated and
11 to read as follows:

12 **"PART . FLUORESCENT LAMPS**

13 **§196- Definitions.** As used in this part, unless the
14 context otherwise requires:

15 "Compact fluorescent lamp" means a compact low-pressure,
16 mercury-containing, electric-discharge light source in which a
17 fluorescent coating transforms some of the ultraviolet energy
18 generated by the mercury discharge into visible light, and
19 includes the following characteristics:

- 20 (1) One base (end cap) of any type, including but not
21 limited to screw, bayonet, two pins, and four pins;



- 1 (2) Integrally ballasted or non-integrally ballasted;
- 2 (3) Light emission between a correlated color temperature
- 3 of one thousand seven hundred Kelvin and twenty-four
- 4 thousand Kelvin and a Duv of +0.024 and -0.024 in the
- 5 International Commission on Illumination Uniform Color
- 6 Space;
- 7 (4) All tube diameters and all tube lengths; and
- 8 (5) All lamp sizes and shapes for directional and
- 9 nondirectional installations, including but not
- 10 limited to plug-in, spiral, twin tube, triple twin,
- 11 2D, U-bend, and circular.
- 12 "Linear fluorescent lamp" means a low-pressure, mercury-
- 13 containing, electric-discharge light source in which a
- 14 fluorescent coating transforms some of the ultraviolet energy
- 15 generated by the mercury discharge into visible light, and
- 16 includes all of the following characteristics:
- 17 (1) Two bases (end caps) of any type, including but not
- 18 limited to single-pin, two-pin, and recessed double
- 19 contact;
- 20 (2) Light emission between a correlated color temperature
- 21 of one thousand seven hundred Kelvin and twenty-four



1 thousand Kelvin and a Duv of +0.024 and -0.024 in the
2 International Commission on Illumination Uniform Color
3 Space;

4 (3) All tube diameters, including but not limited to T5,
5 T8, T10, and T12;

6 (4) All tube lengths from 0.5 to eight feet, inclusive;
7 and

8 (5) All lamp shapes, including but not limited to linear,
9 U-bend, and circular.

10 §196- Fluorescent lamps; mercury-containing lighting;
11 prohibited. It shall be unlawful to sell, offer for sale, or
12 distribute for sale in the State as a new manufactured product:

13 (1) Beginning January 1, , a screw or bayonet base
14 type compact fluorescent lamp; and

15 (2) Beginning January 1, , a pin-base type compact
16 fluorescent lamp or linear fluorescent lamp.

17 §196- Exemptions. This part shall not apply to a lamp:

18 (1) Used for image capture and projection, including
19 photocopying, printing, directly or in preprocessing,
20 lithography, film and video projection, and
21 holography;



- 1 (2) That has a high proportion of ultraviolet light
- 2 emission and is one of the following:
- 3 (A) A lamp with high ultraviolet content that has
- 4 ultraviolet power greater than two milliwatts per
- 5 kilolumen;
- 6 (B) A lamp for germicidal use, such as the
- 7 destruction of DNA, that emits a peak radiation
- 8 of approximately 253.7 nanometers;
- 9 (C) A lamp used for disinfection or fly trapping from
- 10 which either the radiation power emitted between
- 11 two hundred fifty and three hundred fifteen
- 12 nanometers represents at least five per cent of,
- 13 or the radiation power emitted between three
- 14 hundred fifteen and four hundred nanometers
- 15 represents at least twenty per cent of, the total
- 16 radiation power emitted between two hundred fifty
- 17 and eight hundred nanometers;
- 18 (D) A lamp used for the generation of ozone where the
- 19 primary purpose is to emit radiation at
- 20 approximately 185.1 nanometers;



- 1 (E) A lamp used for coral zooxanthellae symbiosis
- 2 from which the radiation power emitted between
- 3 four hundred and four hundred eighty nanometers
- 4 represents at least forty per cent of the total
- 5 radiation power emitted between two hundred fifty
- 6 and eight hundred nanometers; or
- 7 (F) Any lamp used in a sunlamp product. For the
- 8 purposes of this subparagraph, "sunlamp product"
- 9 has the same meaning as defined in title 21 Code
- 10 of Federal Regulations section 1040.20(b)(9);
- 11 (3) Used for medical or veterinary diagnosis or treatment
- 12 or used in a medical device;
- 13 (4) Used in pharmaceutical product manufacturing or
- 14 quality control;
- 15 (5) Used for spectroscopy and photometric applications,
- 16 such as ultraviolet-visible spectroscopy, molecular
- 17 spectroscopy, atomic absorption spectroscopy,
- 18 nondispersive infrared, Fourier transform infrared,
- 19 medical analysis, ellipsometry, layer thickness
- 20 measurement, process monitoring, or environmental
- 21 monitoring; or



1 (6) Used by academic and research institutions exclusively
2 for conducting research projects and experiments."
3 SECTION 3. This Act shall take effect upon its approval.



Report Title:

Fluorescent Lamps; Mercury-containing Lighting; Sales; Compact
Fluorescent Lamps; Linear Fluorescent Lamps; Prohibition

Description:

Prohibits the sale of certain fluorescent lamps as a new
manufactured product, with certain exemptions. (SD1)

*The summary description of legislation appearing on this page is for informational purposes only and is
not legislation or evidence of legislative intent.*





SENATE COMMITTEE ON COMMERCE AND CONSUMER PROTECTION

February 21, 2023, 10:00 AM

Room 229

TESTIMONY IN SUPPORT OF SB 690 SD1

Aloha Chair Keohokalole, Vice Chair Fukunaga, and Committee members:

Blue Planet Foundation **supports SB 690 SD1**, which establishes a “clean lighting standard” by phasing out the sale of new fluorescent bulbs in Hawai‘i. By transitioning from fluorescent bulbs to more efficient LED bulbs, Hawai‘i residents and businesses will conserve energy, save millions on utility bills, and reduce carbon emissions and mercury exposure.

Helping local families and businesses save on electric bills

Hawai‘i continues to have the highest electricity rates and most expensive electric bills in the nation.¹ Energy efficiency measures are a simple, accessible, yet effective tool to reduce the high-cost of electricity for local residents and businesses. Light-Emitting Diodes (LED) lamps are much more efficient than fluorescent bulbs by using half the amount of electricity to produce the same or better amount of light.² LEDs also last two to three times longer than fluorescent bulbs, resulting in life-cycle cost savings for both residential customers and the commercial sector. Estimates show that if Hawai‘i passed this bill with an effective date of 2025, **by 2030, Hawai‘i households and businesses would be saving \$37 million annually on their utility bills.** Through 2050, we would cumulatively save \$446 million on electricity bills.³ By supporting SB 690, Hawai‘i lawmakers would provide millions in utility bill savings for taxpayers to help address the state’s high electricity costs and rising cost of living.

Helping reduce carbon emissions and meet our climate goals

¹Compton, Sophia. “Hawaii has the highest electric bills nationwide in 2022, report finds.” *Pacific Business News*. January 6, 2023. (<https://www.bizjournals.com/pacific/news/2023/01/06/hawaii-had-highest-electric-bills-nationwide.html>)

² Amann, J. T., B. Fadie, J. Mauer, K. Swaroop, and C. Tolentino. “Farewell to Fluorescent Lighting: How a Phaseout Can Cut Mercury Pollution, Protect the Climate, and Save Money.” Washington, DC: American Council for an Energy-Efficient Economy. 2022. (www.aceee.org/research-report/b2202.)

³ “2023 State Clean Lighting Savings Estimates for: Hawaii” *Appliance Standards Awareness Project*. (<https://appliance-standards.org/state-savings-clean-lighting>)

Climate change will have devastating, long-term consequences on Hawai'i's environment, economy, and quality of life. For these reasons and others, the State of Hawai'i has committed to a decisive transition away from fossil fuels. The legislature has passed aggressive carbon reduction goals, including a mandate to achieve 100% renewable electricity by 2045 (Act 97 of 2015), and a goal to be carbon-negative by 2045 (Act 15 of 2018), with an interim goal to achieve a 50% reduction from 2005 levels by 2030 (Act 238 of 2022).

Embracing energy efficiency measures is an important part of addressing climate change and reducing carbon emissions. By eliminating the sale of fluorescent bulbs over time, Hawai'i could prevent 65 metric tons of carbon emissions from entering the atmosphere, each and every year. **Through 2050, this would result in eliminating 756,000 metric tons of greenhouse gases in our state.**⁴ Adopting a "clean lighting standard" would significantly aid our collective efforts to achieve a carbon-negative, clean energy future.

Reducing a needless risk from mercury exposure and pollution

Fluorescent bulbs contain mercury, a toxic chemical that is dangerous to both human health and the environment. Mercury is considered by the World Health Organization as one of the top 10 chemicals of major public health concern for its potential harmful effects on the nervous, digestive, and immune systems. The World Health Organization states, "*There are several ways to prevent adverse health effects of mercury, including promoting clean energy...and phasing out non-essential mercury-containing products.*"⁵ By phasing out fluorescent bulbs over the next few years and transitioning to mercury-free LED bulbs, Hawai'i can avoid a needless health risk.

In addition to the human health impacts, mercury exposure is dangerous to our natural environment. Roughly 75% of fluorescent bulbs are not disposed of properly, which can lead to mercury leaching into landfills, contaminating waterways, and bioaccumulating in shellfish.⁶ By continuing to bring new mercury-containing bulbs in the state, we are continuing the potential for toxic exposure and increasing the volume of bulbs that will need safe disposal.

States are already leading the way on clean lighting

States across the country are adopting "clean lighting standards" to support energy efficiency, reduce mercury pollution, and address climate change. In 2022, both Vermont and California passed state laws to phase out the sale of new fluorescent bulbs. Vermont became the first state to phase out compact fluorescent lamps in 2023 and will phase-out the sale of 4-foot linear fluorescent lights, the most common type on the market, in 2024. California's law goes further

⁴ Ibid.

⁵ "Mercury and Health." *World Health Organization*. March 2017. (<https://www.who.int/news-room/fact-sheets/detail/mercury-and-health>)

⁶ "Clean Lighting". *Appliance Standards Awareness Project*. February 2023. (<https://appliance-standards.org/clean-lighting>).

by including lamps up to 8 feet in its phase-out.⁷ As more states adopt similar legislation and lead the way to an energy efficient economy, the states without a clean lighting policy risk becoming a dumping ground for inefficient, mercury-containing bulbs that suppliers cannot sell elsewhere. Hawai'i should continue to lead the country in pursuit of a 100% clean energy future by phasing out fluorescent bulbs in the next few years.

Conclusion

As Hawai'i progresses toward achieving its 100% renewable energy and decarbonization goals, energy efficiency remains the most cost-effective way to reduce emissions from the electricity sector, while providing financial benefits to Hawai'i residents and businesses during the transition. The cheapest and cleanest energy is the energy that we don't use, and passing SB 690 to establish a "clean lighting standard" has many benefits for our state, taxpayers, and the environment.

Thank you for the opportunity to provide testimony.

⁷ "California Passes Clean Lighting Legislation Banning Fluorescent Lamps." *Electrical Construction & Maintenance*. September 2022. (<https://www.ecmweb.com/lighting-control/article/21251579/california-passes-clean-lighting-legislation-banning-fluorescent-lamps>)



Before the Senate Committee on Commerce and Consumer Protection
Tuesday, February 21, 2023 at 10:00 a.m.

Testimony in Support of SB690 SD1: Relating to Energy Efficiency

Chair Keohokalole, Vice Chair Fukunaga, and Members of the Committee:

Thank you for the opportunity to testify in support and provide comments on Senate Bill 690 SD1.

Hawai'i Energy works to empower island families and businesses on behalf of the Hawai'i Public Utilities Commission (PUC) to make smart energy choices to reduce energy consumption, save money, and pursue a 100% clean energy future. Energy efficiency – the energy we do not use – is the cheapest option to help us achieve our 100% clean energy goal by eliminating waste and being more efficient.

Hawai'i Energy applauds the legislature's efforts to support the continued impact of energy efficiency on Hawai'i's residents and businesses as an integral component of the State's Clean Energy Initiative, which calls for Hawai'i to achieve 100% clean energy by 2045.

The bill would prohibit the sale and distribution of most mercury-containing lighting in Hawaii, meaning a mandated phaseout of, primarily, the linear fluorescent – mercury containing – lighting still favored by many in Hawai'i. It would put the state on a path following in the footsteps of what California and Vermont enacted last year, which will allow Hawai'i to benefit from the market power that California in particular exerts on manufacturers and the appliances they produce and ensure consistency for manufacturers.

Hawai'i Energy is proud to offer a robust array of programs available to both residents and businesses designed to provide low-to-no cost lighting retrofits to replace existing lighting, including mercury-containing fluorescents, with energy-efficient light-emitting diodes (LEDs). Our [Energy Smart 4 Homes \(ES4H\)](#) program provides that opportunity for free to residential properties, and our [Energy Advantage](#) program allows small businesses and restaurants to implement lighting retrofits at greatly reduced costs.

According to the Appliance Standards Awareness Project, phasing out the majority of mercury-containing lighting would in 2030 produce \$37 million in electricity bill savings for Hawai'i, save 129 GWh, cut CO2 emissions by 65 metric tons and eliminate more than three pounds of mercury in lamps shipped to our islands. Senate Bill 690 SD1 is a win for Hawai'i ratepayers, and it is a win for the environment as well.

Thank you for the opportunity to testify in support of Senate Bill 690 SD1.

Sincerely,
Caroline Carl
Executive Director
Hawai'i Energy



Email: communications@ulupono.com

SENATE COMMITTEE ON COMMERCE & CONSUMER PROTECTION
Tuesday, February 21, 2023 — 10:00 a.m.

Ulupono Initiative supports SB 690 SD1, Relating Energy Efficiency.

Dear Chair Keohokalole and Members of the Committee:

My name is Micah Munekata, and I am the Director of Government Affairs at Ulupono Initiative. We are a Hawai'i-focused impact investment firm that strives to improve the quality of life throughout the islands by helping our communities become more resilient and self-sufficient through locally produced food, renewable energy and clean transportation choices, and better management of freshwater resources.

Ulupono supports SB 690 SD1, which prohibits the sale of certain fluorescent lamps as a new manufactured product, with certain exemptions.

Ulupono is supportive of energy efficiency measures to lower electricity consumption across the state and also recognizes the negative health risks associated with mercury. This bill seeks to address both issues by phasing out the use of fluorescent lights to reduce mercury in our environment and encourage use of more energy-efficient options currently available on the market. Fluorescent lights utilize far more energy than alternatives. For example, LED bulbs use half the electricity and last twice as long as fluorescent lights. While there may be a slight incremental cost up front, LED lights have a payback period ranging from 1 to 2.5 months, depending on the bulb.¹ According to the Appliance Standards Awareness Project, this transition will save an estimated 129,000 MWh per year in 2030, equivalent to a 64MW solar farm. This will help avoid the consumption of roughly 223,000 barrels of oil per year while reducing cumulative energy bills my more than \$35 million per year.²

As Hawai'i's electricity costs are expected to rise in the near-term,³ we must consider our energy future to support affordable and resilient options for our local communities in the long run.

Thank you for the opportunity to testify.

Respectfully,

Micah Munekata
Director of Government Affairs

¹ <https://www.aceee.org/research-report/b2202>

² <https://appliance-standards.org/state-savings-clean-lighting>

³ See Hawaiian Electric Newsroom, "Driven up by Russian invasion, oil prices will push electric bills higher in coming months," March 10, 2022. <https://www.hawaiianelectric.com/driven-up-by-russian-invasion-oil-prices-will-push-electric-bills-higher-in-coming-months>

SB-690-SD-1

Submitted on: 2/18/2023 9:29:24 AM

Testimony for CPN on 2/21/2023 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Douglas Perrine	Individual	Support	Written Testimony Only

Comments:

Fluorescent lamps contain mercury, a deadly neurotoxin, and are rarely disposed of in a safe way. They offer no energy-saving advantages over much-safer LED lamps, so should not be allowed for sale, for the safety of our people and our environment.

SB-690-SD-1

Submitted on: 2/19/2023 7:47:23 PM

Testimony for CPN on 2/21/2023 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Sherry Pollack	Individual	Support	Written Testimony Only

Comments:

I support SB690 SD1 and the phasing out of the sale of mercury containing bulbs in Hawaii. This will prevent toxic pollutants from being brought into the State's ecosystem, reduce energy use, and save consumer dollars.

Mercury is a toxic pollutant. Mercury can be very harmful to the brain and even small amounts can damage a brain that is just starting to form or grow. Two-thirds of the mercury pollution in the environment comes from industrial pollution. This pollution accumulates in fish. People are primarily exposed to mercury from eating fish, especially large predator fish like ahi, one of the most popular fish eaten in Hawaii.

Steps need to be taken to reduce mercury pollution. Phasing out the sale of mercury containing bulbs is an important step that will help this effort. There are mercury-free alternatives that exist, including LEDs. In addition to being mercury-free, LEDs are more energy efficient and are cheaper. Passing SB690 SD1 is a win:win.

Mahalo.

LATE

DATE: February 20, 2023

TO: Senator Jarrett Keohokalole
Chair, Committee on Commerce and Consumer Protection

FROM: Tiffany Yajima

RE: **S.B. 690, S.D.1 – Relating to Energy Efficiency.**
Hearing Date: Tuesday, February 21, 2023 at 10:00 a.m.
Conference Room: 229

Dear Chair Keohokalole, Vice Chair Fukunaga, and Members of the Committee on Commerce and Consumer Protection:

On behalf of the Alliance for Automotive Innovation (“Auto Innovators”) we submit these **comments** on S.B. 690, S.D.1 and ask for an amendment to exempt fluorescent lamps utilized as replacement bulbs for previously manufactured vehicles.

From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – the Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. The association is committed to a cleaner, safer and smarter personal transportation future.

Automakers have phased out fluorescent lamps for new vehicles, but older model vehicles still utilize small fluorescent lamps to light-up display units such as navigation systems and entertainment systems. These auto parts are no longer used in new vehicles but are needed for vehicle repairs. Sales of these bulbs are infrequent and are expected to diminish over time as late model vehicles are taken off the roads. No other alternative exists to replace these bulbs.

Therefore, we respectfully ask the committee to include exemption language under section 2 of the bill as follows:

§196- Exemptions. This part shall not apply to a lamp:

(7) Used to replace a lamp in previously manufactured motor vehicles.

Thank you for the opportunity to submit **comments** on this bill.