

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580



Office of the Executive Director

August 5, 2010

To: Chair Nancy Sutley, Council on Environmental Quality
Director Peter Orszag, Office of Management and Budget

Subject: Executive Order 13514, Agency Sustainability Plan

Statement of Policy

The Federal Trade Commission commits to compliance with all environmental and energy statutes, regulations and Executive Orders. The Federal Trade Commission currently maintains existing programs related to recycling of all paper, glass and plastics, use of high efficiency fluorescent lighting and providing motion sensitive lighting controls for all offices in our headquarters building at 600 Pennsylvania Avenue, NW Washington, DC.

Even with these measures in place the Federal Trade Commission realizes there are opportunities for further improvement. To support the Executive Order and further reduce our Greenhouse Gas (GHG) emissions the Federal Trade Commission will continue to encourage the increased use of mass transit by all staff, utilize teleconferencing to reduce travel by employees whenever possible and to purchase only energy efficient equipment for the headquarters building.

Currently the Federal Trade Commission provides the maximum allowable pre-tax limit of up to \$230.00 each month for transit subsidy benefit allowance for each employee. Our baseline information has been included in our Scope 3 response. Using this data as a starting point we will initiate programs to further inform staff of the importance and impacts of their commuting choices towards the environment.

The Federal Trade Commission continues to increase the use of the teleconference program throughout our agency by installing state-of-the-art audio and video equipment at our headquarters building and all eight regional offices. This equipment provides the ability of staff to meet on a regular basis without the need for extensive travel. We maintain a baseline record of employee travel and our hope is that through a concerted effort focused on time savings and education we can reduce employee travel.

The Federal Trade Commission has committed to only purchase electro-mechanical items with the highest efficiency ratings. Examples of these items that we have begun phasing in are low-flow water valves and high efficiency rated compressors. These changes can be easily tracked and have no negative impact on the operation budget since these are normal wear items.

Sustainability and the Agency Mission

The mission of the Federal Trade Commission is to protect consumers and maintain competition in the American marketplace. The true spirit of these goals is to show leadership to the American public by our thoughts and actions in the free enterprise business system.

The experience of reinforcing the importance to our staff of their impact on the environment along with improvements to our purchasing of resources will blend with their institutional knowledge of current government initiatives.

By providing a more efficient and globally centric environment for our staff we will remain poised to help the American public by our knowledge and understanding of technologies and their risks.

Greenhouse Gas Reduction Totals

Under our Scope 2 submission the Federal Trade Commission commits to a green house gas reduction target of 4.4% of current totals by 2020 for our headquarters building located at 600 Pennsylvania Avenue, NW in Washington, D.C. We will review developing sustainable technology and initiate improvements based on economic and social benefits, and will continue to report these improvements to your offices and to maintain transparency to the public.

Green IT

The Federal Trade Commission has taken a significant step towards improving the agency's IT infrastructure and, at the same time, reducing energy consumption, by chartering the Information Technology Architecture (ITA) Release 1 project. The overarching goal of ITA-1 is to provide FTC with a useful, reliable, and efficient IT infrastructure services with the deployed architecture aligned with agency mission goals. The ITA-1 project by design:

- Improves FTC's security posture
- Increases IT Service availability
- Increases FTC end user productivity
- Reduces operational cost through standardized infrastructure, standardized operational procedures and reduction in the consumption of data center floor space, power, and cooling
- Increases FTC's Business Agility

FTC's IT services are critical to fulfilling its mission. ITA-1 recognizes this and provides services that are designed to be highly available, scalable, and highly energy efficient. Services are critical to enhancing FTC users' access to applications for a high percentage of scheduled time by attempting to reduce unscheduled outages and mitigate the impact of scheduled downtime for particular servers. The FTC achieves this high availability, high energy efficient environment platform by using virtualization.

Some additional Green IT benefits to the agency include:

- Reduce energy costs - Green IT covers a host of technologies. All of which act to reduce power and cooling costs and to improve the energy efficiency of servers, storage, and associated equipment within the datacenter.
- Improved Storage Solution Availability
- Reduce operating costs
- Reduce server provision time from hours to minutes
- Dramatically reduce disaster recovery and unplanned downtime
- Ability to meet the changing requirements for system resources and capacities.

Plan Implementation

The Apex building at 600 Pennsylvania Avenue, NW was constructed in 1937 and is the home of the Federal Trade Commission headquarters. Due to the type of construction of the building there are limitations on what can be altered to make the facility more efficient. As an example heat is supplied to the facility via steam pipes connected to the General Services Administration (GSA) steam plant. Our initial investigation into the possibility of producing our own heat for building services determined there would be huge outlays of funds required for a connection to a natural gas line and the infrastructure to provide an internal steam source within the limited space of the building. Combining these costs with the increase in utility costs for natural gas it was determined that this type of expense was not feasible at this time.

During these times of ever-tightening federal budgets we at the FTC feel there are means by which we can increase the efficiency of the facility by utilizing the annual budget to make sound decisions and purchases based on research of total cost of ownership.

As an example of these types of purchases the Federal Trade Commission recently completed a renovation of the locker and shower facilities at our headquarters building. The shower heads were replaced with low-flow systems, which deliver sufficient water pressure for cleansing, while utilizing 25% less water than standard shower heads. The quality and integrity of the product has proven to be outstanding so under our annual repairs and maintenance budget we will begin a five year plan to systematically replace each valve in the building.

In conjunction with the Office of the Executive Director (OED) the Federal Trade Commission will form a Waste Reduction Team. The team will consist of staff that are representatives of the financial management, facilities, human resources and transportation offices who will work on a three phase program that will educate and encourage staff to reduce environmental impacts at work and in their home life as well.

Phase one of the plan is to make sure all FTC staff are aware of the resources available to them through the transit subsidy program which encourages use of the Washington Metropolitan Area Transit Authority system. We will include not only the enrollment forms but also include data in an outreach campaign to all staff on how using different forms of transportation will reduce GHG emissions. We will also encourage use of alternative means for commuting such as bicycles and carpools.

Phase two of our plan is to overlay GHG emission data on employee travel versus the use of teleconferencing. Redefining the old axiom "Time is Money" as "Time is Money and Energy" to support a program of time management as to where staff can be the most productive while reducing their impact on GHG emissions. This program will require feedback from staff and will evolve over the next several years.

Phase three of our plan will utilize investigative tactics to determine the most efficient means of purchasing components that utilize purchased resources such as water, steam and electricity. The commission purchases replacement components each year consisting of water and steam valves and compressors for the

HVAC system. The Federal Trade Commission commits to purchasing replacement systems based on their overall efficiency as the deciding factor.

This three phase approach will be productive as we continue to enlighten staff on GHG emissions and to come to a “think before you use” state of mind. At the same time it will not require separate funding nor will it be disruptive to the work of the commission. The goal will be to have an educated staff that maintains a global awareness of GHG emissions and their consequences.

Evaluating Return on Investment

The Federal Trade Commission plans to review developing sustainable technology and initiate improvements based on economic and social benefits. Initially we feel that most of these enhancements can be accomplished through normal repair and operations budgeting between 2011 and 2020.

Transparency

The Federal Trade Commission will continue to report these improvements to your offices and to maintain transparency to the public.

Best regards,



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