Here are some comments.

(1) Perhaps the label should also explain the software's behavior in case it cannot get an update. Consumers would want to know that if their eLightBulb did not get internet connection (or security updates) for six months, it bricks. In thinking casually about it, there appear to be two aspects.
First, does the software require some regular update (or at least connection to "home base" to check for updates)? This could either be *any* connection to the internet or specifically, some confirmation from "home base". This confirmation could be a simple "the latest software version is nn.nn.nn" or software updates.
Second, what does the software do if it *doesn't* get connection/confirmation?
  A. continue running the software version that it has
  B. fall back to some "minimum" or "safe" behavior, e.g., disable "smart functions" but still turn off and on with a physical switch. This might be reasonable behavior for a smart light bulb.
  C. software ceases to function ("bricks")
     I didn't see a really good place to put this information. Perhaps under #3 Critical Cybersecurity . . . or maybe near 2.3.1.5, which deals with end of support.

(2) Related to 2.3.3.4 Hardcoded Secrets, maybe include free from "back doors"? Of course, if government requires a backdoor in a piece of software, they likely would require the backdoor to be secret. So maybe this would rarely be useful in practice.

(3) Under 2.3.4.1 PII, Attestation, the bullet list. Perhaps add birthdate (or even age) to the first bullet. Maybe this is this not usually considered PII.

(4) Availability of labels is mentioned a few times:
"Labels should be available to consumers at the time ... of purchase ..."
As written, it might be interpreted to mean "After you *buy* the software, you can look at the label." The wording might be clarified to be something like "... available to consumers prior to purchase ..." so the consumer can use label information in purchase decisions.

(5) In Table 1, some of the bold-type words in descriptions are in italic and some are not. A quick glance didn't make it clear why the difference. Also, some description have full sentences, some use a hyphen to separate the "key phrase" from the rest, and some use a colon. These differences may be unintentional.

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Paul E. Black