



June 30, 2009

Ms. Katharine Kaplan  
ENERGY STAR for Consumer Electronics  
Office of Air and Radiation  
United States Environmental Protection Agency  
Washington, DC 20460

VIA E-MAIL: bkundu@icfi.com

**RE: Draft 2 Versions 4.0 and 5.0 ENERGY STAR TV specification**

Dear Ms. Kaplan:

Best Buy is pleased to submit input to the U.S. EPA regarding the Draft 2 Versions 4.0 and 5.0 ENERGY STAR TV specification.

Best Buy is North America's leading retailer technology and entertainment products and related services with a commitment to growth and innovation. We reach millions of consumers each year through 1,036 U.S. retail locations, multiple call centers and Web sites. The Best Buy family of brands and partnerships collectively generates more than \$40 billion annual revenue and includes brands such as Best Buy, Audiovisions, The Carphone Warehouse, Future Shop, Geek Squad, Jiangsu Five Star, Magnolia Audio Video, Napster, Pacific Sales Kitchen and Bath Centers, The Phone House and Speakeasy.

Best Buy is also a manufacturer of exclusive brand consumer electronics, including televisions.

**COMMENTS on Draft 2 Versions 4.0 and 5.0 ENERGY STAR TV specification**

**A. ON Mode Requirements**

- a. We suggest that the formula or curve used in On Mode Requirements be adjusted to level the playing field for larger televisions to qualify for the ENERGY STAR rating. Note that Best Buy encourages a strong ENERGY STAR standard for televisions that represents 25% or less of available models within each size category. The current formula or curve is disproportionately weighted to favor smaller screen sizes qualifying for the ENERGY STAR label. Although the proposed formula may meet EPA's guideline of 25% or less overall television market share, the available models will largely be comprised of 23" and smaller sets.
- b. Customers look to screen size as a 'quality and performance' standard. We suggest that EPA adjust this curve as to not further violate the EPA guideline, "By choosing ENERGY STAR, you are helping prevent global warming and promote cleaner air without sacrificing the product quality and performance you expect." Best Buy firmly believes that we need to allow customers choice. Our customers deserve the ability to invest in any size television they would like and still be able to identify the best energy efficient model in that size group.

**B. Automatic Brightness Control**

- a. No comments.

**C. Luminance**

- a. EPA's position that Luminance regulation in the ENERGY STAR standard will "promote international harmonization of requirements" is flawed. These regulations are exactly that – regulations. EPA is comparing a voluntary ENERGY STAR program to what will soon be a matter of regulation and law in Europe that will apply to every television sold. There will be no issues in Europe for customers to see a negative performance factor in



ENERGY STAR qualified televisions due to luminance; however, this situation certainly could exist in the U.S. under the EPA proposal. Under the EPA luminance proposal, manufacturers will soon have the choice whether to (a) qualify a television as ENERGY STAR, or (b) forgo the ENERGY STAR qualification and create a more energy consumptive and brighter television. Some manufacturers are likely to decide that a brighter television will sell more units than an ENERGY STAR qualified television. A real concern would then be a customer's perception as they are staring at a wall of televisions in a retail store. Under the EPA luminance proposal, the ENERGY STAR qualified televisions would appear dimmer as compared to the brighter non-qualified televisions.

- b. This situation is therefore in direct conflict with the claims on the ENERGY STAR website that, "By choosing ENERGY STAR, you are helping prevent global warming and promote cleaner air without sacrificing the product quality and performance you expect." We believe customers associate 'quality and performance' to the brightness of a television.
- c. It is not in the EPA's interest to have retailers and manufacturers conduct tests on what sells more units – a brighter television against one that is ENERGY STAR qualified.
- d. This idea is valid if we can include it in the Federal Minimum Efficiency Standards – so that it applies to every television sold in the US. We believe it will be counter-productive to the ENERGY STAR brand image if this idea is implemented in the voluntary ENERGY STAR program.

**D. Download Acquisition Mode**

- a. No comments.

Thank you for the opportunity to provide this input. If you have any questions, I can be reached directly at (612) 291-9628 or [thad.carlson@bestbuy.com](mailto:thad.carlson@bestbuy.com).

Respectfully submitted,

Thad Carlson  
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