

# **PLASMA DISPLAY COALITION**

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**JAMES M. PALUMBO**  
PRESIDENT

June 30, 2009

Ms. Katharine Kaplan  
ENERGY STAR  
U. S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
MC6202J  
Washington, DC 20460

Re: COMMENTS TO ENERGY STAR DRAFT 4.0 TV SPECIFICATIONS

Dear Katharine:

The Plasma Display Coalition (PDC) is replying to the ENERGY STAR TV 4.0/5.0 draft 2 specification of June 5, 2009 and the stakeholder web conferences held the week of June 24, 2009.

For background, members of the PDC (LG Electronics, Panasonic Corporation of North America, and Pioneer Electronics) are among the world best known, most respected marketers and manufacturers of both high quality LCD and superior performance plasma HDTVs. The PDC and its members have continuously demonstrated support of the ENERGY STAR program and objectives. We continue to believe it is in the best interest of American consumers that the ENERGY STAR logo represents an important informational message representing energy efficient products -- without sacrificing advanced product performance or size.

We are very concerned about the new policy changes that the popular ENERGY STAR program appears to be making. It is nonsensical to penalize the very manufacturers who have helped to broaden the visibility and appeal of ENERGY STAR by establishing new parameters that unfairly favor small-screen television products. Our industry's success in achieving real energy savings for consumers is not a reason to penalize the TV manufacturing business community with the proposed "on-mode" program changes.

## **ON-MODE REQUIREMENT**

In establishing the on-mode 4.0 proposal, the EPA objective was to "set power requirements without sacrificing features or performance." To this end, the EPA has proposed accepting approximately 25% of the data set, with 'models across a range of screen size categories'. The industry, and the PDC, in May

reply comments indicated the 4.0 draft 1 did not meet the objective of the program. Specifically we concluded that:

1. the proposed specification was biased against larger screen and better performing TV;
2. the EPA proposal favors under 23" and Digital Light Processing projection TV; together these categories make up the greatest share of the 25% program compliance target; and,
3. the ENERGY STAR program risks losing support of the TV business community as the proposal contradicts common good business practices to offer and sell a wide range of more fully featured and larger screen size products that meet consumer demand.

We were also disappointed to read Draft 2 of the 4.0 specification, which simply ignored any recommendation of industry to solve the shortcomings of the on-mode proposal and make it a more balanced program to meet EPA's stated goals. During the June 24, 2009 conference, the EPA rationalized the decision to ignore the television manufacturing industry was due, in part, to the fact a high percentage of TVs were qualified under the current program. However, as explained in the June 24th conference, the substantial improvement in energy consumption made by most manufacturers in the 2008 model line-up coupled with the new IEC test method allowed for an unexpected high rate of ENERGY STAR achievement. Again, our industry's success in energy reduction is not a reason to penalize the very companies who are making the investments to make their products more efficient.

During the June 24, 2009 conference, the EPA stated that no change had been made to the on-mode proposal, in part due to the EPA's belief that manufacturers will exceed the proposed power levels. This decision was based on input from analyst surveys and public relations press releases as well as future forecasts that may or may not become standard practices. As stated by several manufacturers during the conference call, it is a questionable practice for the EPA to rely on predictions from industry analysts or biased energy-producing utilities to justify the new proposal rather than speaking with the U.S. representatives of the major TV manufacturers. During this conference call, it was also evident that several TV manufacturers in the meeting were not aware of the data on which EPA based their decisions. We recommend that the EPA consult, share and verify with each manufacturer the data and reports that were referenced and used in the EPA decision to establish energy specifications. Without such verification, the EPA cannot be in a position to justify and support its decisions. In short, you are making public policy based on predictions and guesses instead of verifiable information. This is a serious concern for members of the Plasma Display Coalition and we believe the entire TV industry.

At the conclusion of the June 24, 2009 conference call, we were encouraged to hear that the EPA will review the small screen (under 23" screen size) issue and we hope that a fair and balanced approach will be adopted that insures that consumers will be able to find ENERGY STAR labeled products in every screen size. Our biggest concern is with 42 inch and larger models that are the most popular plasma HDTV screens with consumers. The EPA must recognize the buying habits of the consumer, who typically shop and buy screen sizes to meet their room size needs first. Therefore, consumers should have the opportunity, by screen category, to find a reasonable number of ENERGY STAR products in a 'best in class' program. We strongly recommend that as the EPA moves the ENERGY STAR program to the next phase, it recognize the reality that energy savings can occur at every level and that some of the biggest gains in energy efficiency can be found in the largest screen sizes (especially when compared to the older, inefficient TV sets that the consumer will be retiring.

Respectfully,

Jim Palumbo

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