

Final Version 5.0 ENERGY STAR TV Specification Comment Response Summary Document
January 24, 2011

This document is intended to summarize comments submitted by stakeholders in response to the EPA Proposal Memo regarding the effective date of Version 5 and includes an EPA response to each comment. Please note: this summary includes only those comments that EPA received permission to make public.

REF NO.	Topic	Comment	EPA Response
1	DAM	Stakeholders commented that the proposed Version 5 DAM requirement of 20 Watt-hours per day (0.02 kWh/day) is too stringent and may not be achievable by the proposed July, 2011 effective date.	Based on data for DAM-enabled models on the ENERGY STAR Qualified Product List, and in light of the accelerated timeline, EPA has modified the maximum allowable DAM energy to 40 Watt-hours per day (0.04 kWh/day) in the final Version 5.3 specification.
2	Effective Date	Many stakeholders reiterated the need to move up the effective date of the Version 5 specification; specifically citing ENERGY STAR brand relevance in the marketplace, the continued success of utility rebate programs, and the high level of ENERGY STAR market penetration across all product types.	EPA appreciates this support for this proposal and intends to continue to work diligently to keep the Televisions specification relevant in a quickly changing market. EPA plans to launch the Version 6 development effort in early 2011.
3		Stakeholders voiced concerns that a mid-year specification change would cause retail disruptions and consumer confusion. Stakeholders further noted the expected difficulty of making changes to labeling and packaging in a short amount of time.	EPA has revised the effective date for the Version 5.3 specification to September 30, 2011, to provide stakeholders additional time to prepare for the new effective date. EPA will use ENERGY STAR program communication resources and will work closely with retail partners between now and September to provide clear and current information to stakeholders regarding ENERGY STAR qualified products. Further, so that consumers can expect that ENERGY STAR labeled products fully meet the latest requirements upon their effective date, EPA has updated its specification transition cycle.
4		Stakeholders noted that high market penetration and the existence of products that far exceed the current ENERGY STAR limits should be seen as a positive indication of the success of the ENERGY STAR program.	While EPA does recognize the impressive advances in energy efficiency in televisions in recent years, the ENERGY STAR label is intended to help consumers differentiate products on the basis of efficiency – a difficult goal to achieve when a larger percentage of televisions on the market carry the ENERGY STAR label. To this end, EPA will continue to pursue efficiency gains and work to ensure that market penetration remains near 25 percent.
5		Stakeholders suggested that EPA use the rapid adoption of the V4 requirements as an opportunity to promote the effectiveness of the program.	EPA agrees with the concept and has been framing the TVs program as a success story.
6		Stakeholder commented on the short window to evaluate the impact of moving up the effective date.	EPA allowed more than 3 weeks for comment on this proposal, hosted a webinar for stakeholders, and shared all data supporting the proposal. Further, with more than 26 % of ENERGY STAR qualified products able to meet the V5 requirements including 27% of larger screen sizes, and new, more efficient models being released between February and April of 2011, EPA believes that many partners will have products on the V5 Qualified Product list come September.
7		Power Overhang	Stakeholders suggested that the process of defining and limiting power consumption in power overhang state promises very little energy savings in exchange for a large amount of time and effort.
8	Stakeholder suggested that if Power Overhang was user selectable, such features should be disabled by default.		EPA will take this into account and assess the proposal during the Version 6 specification development process.

9	Efficiency Requirements for Models Greater than 50 Inches	Many stakeholders proposed revising the On Mode power consumption limits for televisions greater than 50 inches citing the stringency of these requirements.	EPA's analysis of the current ENERGY STAR Qualified Product List shows that 27% of sets larger than 50 inches currently meet the Version 5 requirements. The televisions that meet the requirement represent a wide variety of sizes and available features as well as both conventional and LED backlit LCD models. Thus, EPA has decided to retain the Version 5 On Mode requirements as previously written.
10	Version 6	Stakeholders commented on the need to begin development of the Version 6 requirements quickly as to stay relevant in today's rapidly changing Televisions market.	EPA intends to begin development of Version 6 in early 2011.
11		Stakeholders commented that predicting future specification levels represents a change in EPA's established practice and warrants consultation with stakeholders. Stakeholders suggested that EPA consider annual specification reviews instead.	Although EPA is always eager to hear feedback on this program and how to maximize its effectiveness, the DOE/EPA MOU called on the ENERGY STAR program to set out year tiers for rapidly evolving products. Doing so has been credited, in part, with the rapid increase in efficiency in TVs. For products like TVs, where the movement is dizzying, EPA is constantly reviewing the market and the relevance of our specification. Even annual reviews are too slow.