



Working Together, Advancing Efficiency

November 7, 2007

Katharine Kaplan  
ENERGY STAR Marketing Manager  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the ENERGY STAR draft television specification. These comments were developed based on CEE Consumer Electronics Committee (Committee) discussion of the Draft 2, Version 3.0, ENERGY STAR Television Specification issued on September 24, 2007. Thank you for the chance to provide input on the draft specification. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE strongly supports EPA's technology neutral approach for this specification. We believe that technology neutrality is a critical component of the ENERGY STAR program because it enables ENERGY STAR to deliver consumers consistent energy savings for a given function (e.g. television viewing) and amenity level (e.g. resolution), regardless of the technology type they purchase.

In past comment letters, we have stated that it is very important that the ENERGY STAR specification be set at a level high enough to generate significant energy savings and also be responsive to current sales trends. Based on our review of Draft 2, it appears the decision set forth in the draft to include all technologies in the same data set and set the maximum On Mode power consumption by screen resolution category will yield real energy savings. We strongly support this approach.

CEE supports the proposed September 1, 2008 effective date for this specification. We believe that this date is of particular importance for two reasons. First, manufacturer data indicates that peak sales occur between October and January. Second, the February 2009 U.S. transition from analog to digital broadcasting will likely boost television sales during that period; some percentage of consumers will elect to purchase a new television rather than a Digital to Analog converter box. A delay in the effective date would constitute a significant lost opportunity for energy savings.

Further, CEE supports ENERGY STAR's proposal to require televisions that are attached to computers and used as monitors to power down. In pursuit of additional savings, CEE recommends that EPA recognize an "Off Mode" in the specification, which would enable and encourage manufacturers to include a hard off switch on their ENERGY STAR-qualified products.

Lastly, CEE supports ENERGY STAR's efforts to recognize continuing efficiency improvements in this category and provide advanced notice to all stakeholders about upcoming

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specification changes. We understand that EPA will adopt a “Tier 2” efficiency level on September 1, 2010, which will be developed in 2008-2009 with stakeholder input. We look forward to participating in that process.

Thank you again for the opportunity to comment. CEE looks forward to continuing its participation in this specification revision process as it moves forward. Specifically, we may elect to submit additional comments after receiving the follow-up information from the November 6 conference call. If you have any questions about these comments, please direct them to Margie Lynch, CEE Program Manager, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman  
Executive Director

**Supporting Organizations**

American Council for an Energy-Efficient Economy  
Energy Trust of Oregon  
National Grid  
Natural Resources Canada  
Natural Resources Defense Council  
New York State Energy Research and Development Authority  
Northeast Energy Efficiency Partnerships  
Pacific Gas & Electric  
Sacramento Municipal Utility District  
Western Massachusetts Electric Company  
Wisconsin Focus on Energy