



December 11, 2007

Ms. Katharine Kaplan
United States Environmental Protection Agency
Office of Air and Radiation
Washington, DC 20460

Dear Ms. Kaplan:

Thank you for the opportunity to comment on the updated proposal for the ENERGY STAR Program Requirements for Televisions: Version 3.0, draft 2. The following comments are on behalf of Sharp Electronics Corporation of Mahwah, New Jersey.

Sharp Electronics Corporation continues to support EPA's technology neutral policy with a single set of rules regardless of the display technology used in the television; however, we find the most recent proposal for On Mode power requirements to be inconsistent with regards to the data.

Our specific objections to the most recent On Mode proposal are these:

The proposal is not consistent across screen sizes.

The proposal includes an abrupt step. This step does not appear in the data.

The proposal should be technology independent across all screen sizes.

There is no need to give such large, additional considerations to large screen sizes, since there are methods of reducing power consumption such as the forced menu and automatic brightness control techniques.

Regarding screen sizes, our analysis shows the following On Mode compliance rates using the latest data set for HD televisions:

- 50% of 60-73 inch TVs
- 60% of 50-59 inch TVs
- 31% of 40-49 inch TVs
- 24% of 30-39 inch TVs
- 10% of 20-29 inch TVs

This data demonstrates that the current proposal is clearly inconsistent regarding screen size. We prefer that the On Mode requirements be based on consistent criteria, such as EPA's 25% compliance target.

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Regarding the abrupt step size at 1,000 sq. in., we find no such abrupt step in the data, nor do we find such an abrupt step in the power consumption in our own model range. For instance, our D64 series televisions range from 42-inches up to 65-inches, and its power consumption increases roughly linearly with screen area.

The proposed step increase in power consumption at 1,000 sq. does not exist in the real world. We prefer that the On Mode requirements be based on real-world data.

Also regarding the abrupt step, based on provided Graphs from EPA, we note that the qualification rate for high definition plasma televisions over 1,000 sq. is 4 out of 15 or 26.7%. In essence, the latest On Mode proposal is technology independent below 1,000 sq. in. but is technology dependent above 1,000 sq. in. The proposal is a combination of a television curve and a plasma curve.

We prefer that the On Mode rules be technology independent across all screen sizes.

Finally, there is no need to give such large, additional considerations to large screen sizes. Television manufacturers will be able to apply methods of reducing power consumption such as the forced menu and automatic brightness control techniques. These techniques can be used with any display technology. We expect that compliance rates will increase quickly during the two years planned for the Tier 1 On Mode power consumption requirements.

Such a consideration for large screen sizes coupled with expected increases in compliance rates will quickly move the ENERGY STAR program from a "top performer" program to a "most products qualify" situation. This would undermine the ENERGY STAR program in the large TV segment. This could undermine consumer confidence in the program.

In summary, we respectfully ask that EPA consider a consistent compliance rate across screen sizes.

Thank you for the opportunity to comment on the proposed specification. We plan to continue our active role in television power standardization efforts, and we wish all involved the best in achieving a successful update to the ENERGY STAR Program Requirements for Televisions.

Please feel free to contact me by e-mail at Itaru.Sato@sharpsec.com if you have any questions.

Sincerely,


Itaru Sato
Manager- Corporate Environmental Affairs
Sharp Electronics Corporation