

## **Comments on Revised On Mode Proposal**

Submitted by:

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### **Abstract**

I support the Revised On Mode Proposal. In the long term this Revised Proposal will allow a greater reduction in overall TV Set power consumption than the earlier proposals.

### **Comments**

The Revised On Mode Proposal, that was released by Energy Star on November 26, 2007, is a step in the right direction and will do a better job of achieving the goal of reducing power consumption than the previous Energy Star proposals. While the Revised Proposal apparently does not satisfy many environmental groups, it will indeed serve the environment better because it allows a broader range of TV products to participate in the Energy Star program. This will in the long run result in greater energy savings.

The objection of the environmental groups is based on the less strict criteria of the Revised Proposal. If I take a short term view of the problem, I can understand the concerns of the environmental groups. However I believe that in the long term the Revised Proposal will indeed reduce the TV set power by a significantly larger amount than the earlier proposals.

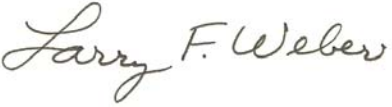
The earlier proposals were seriously flawed because they clearly divided the major display technologies and gave Energy Stars to all Projection TVs and virtually no Energy Stars to Plasma TVs. The earlier proposals significantly reduced the incentive of both of these technologies to reduce power. Since all of the Projection TVs would receive Energy Stars, there would be no need for them to further reduce power. The earlier proposals would also greatly reduce the incentive for Plasma TVs to reduce power since Plasma TV manufacturers would not be able to meet the more strict requirements and would consider Energy Star a lost cause.

The Revised Proposal would allow a small but significant number of Plasma TVs to earn Energy Stars. This would strongly motivate manufacturers of other Plasma TVs to catch up to the lowest power Plasma TVs that have earned Energy Stars. The significant number of Plasma TVs that earn Energy Stars would clearly demonstrate to all Plasma TV manufacturers that it is not a lost cause. The powers of a competitive market will soon cause a significant reduction in overall Plasma TV power.

It is important to remember that the proposal to award Energy Stars based on On Mode Power is a major step for the Energy Star program. The Revised Proposal now would allow all major TV Technologies to participate in the Energy Star program in a significant way. The Revised Proposal is a much more appropriate way to launch this major new Energy Star program.

I would be happy to have further discussions with the EPA officials on these comments.

Respectfully submitted,

A handwritten signature in cursive script that reads "Larry F. Weber". The signature is written in black ink and is positioned above the printed name.

Dr. Larry F. Weber