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Re: Panasonic Comments on ENERGY STAR Most Efficient 2013 Proposed Criteria

Panasonic Corporation of North America (“Panasonic”), a leader in the manufacture and sale of flat panel television technologies, appreciates the opportunity to comment on proposed ENERGY STAR Most Efficient 2013 (ME 2013) recognition criteria as applied to televisions. Although we appreciate the product differentiation provided by the current Most Efficient criteria that recognizes 10 Panasonic models, we are deeply concerned over the proposed criteria for ME 2013.

Market Segmentation of Most Efficient 2013 Will Severely Limit Recognition

During the September 27, 2012, webinar on its proposed ME 2013 criteria, EPA stated that the top 5% of current TV market would qualify and that 49 of 849 products would be recognized across all major sizes. While EPA’s claim may be factually accurate, the breakdown by specific TV sizes created by the proposed qualifying criteria is skewed in favor of smaller size TVs. Under 35 inch TVs predominate the Most Efficient list with 61% of total products. Of the 30 models in the “small-size” grouping, only Samsung models qualify among the largest TV manufacturers (group including Panasonic, LG, Sony, Sharp, Samsung). Consumers using the ENERGY STAR Most Efficient designation to guide their purchases will likely be disappointed to find their familiar brand names not populated among the ME 2013 models.

In the size grouping of 35-50 inches, EPA lists just 9 ME 2013 qualifying models, which points to the criteria as being overly aggressive in the highest selling, most popular size category among consumers. Among the major manufacturers cited earlier, only Samsung has any qualifying models in the popular 37, and 40-inch size categories. In fact, the only specific size for which the ME 2013 criteria is “reasonably populated” are the 46 and 47-inch TVs, which have models from only from a single manufacturer.

At the larger end of the size spectrum as grouped by EPA (50+ inches), the number of qualifying models is slim, and virtually non-existent above 55 inches. If EPA's objective is to steer consumers to highly efficient smaller size TVs, the proposed ME 2013 specification would accomplish that goal.

However, Panasonic strongly believes that consumers should have more choices in the ME 2013 program, populated by TVs across all sizes and major brands. The current proposal is over reaching, and largely steers consumers toward a single manufacturer, which should not be an objective or intentional consequence of the Most Efficient program.

Further, claiming that five manufacturers currently have products that would qualify is misleading as two of the manufacturers are actually the same marketer (Philips and Funai), and a third manufacturer (Gold Alliance Electronics) cannot be found on the September 2012 ENERGY STAR TVs qualifying products database.

For these reasons, Panasonic urges the EPA to reconsider its proposed ME 2013 levels to ensure greater participation by more manufacturers and an expanded consumer choice in the marketplace.

Panasonic is proud to be an ENERGY STAR Partner and hopes that our views are given careful consideration.

Sincerely,

Mark J. Sharp
Group Manager, Corporate Environmental Department
Panasonic Corporation of North America

