

September 11, 2014

Ms. Ann Bailey
Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
Via e-mail: mostefficient@energystar.gov

Re: Panasonic Comments on ENERGY STAR Most Efficient 2015:

Panasonic is a strong supporter of the ENERGY STAR brand and its program objectives, which have been exemplified in the current lineup of our most efficient TV models ever. As a leading manufacturer and marketer of all television technologies, Panasonic appreciates the opportunity to comment on the ENERGY STAR Most Efficient TVs 2015 draft criteria.

ENERGY STAR Most Efficient 2015 Qualifying Criteria:

During the September 4th stakeholder webinar on the proposed criteria, EPA's dataset using the June QPI revealed that 26 models would be recognized by the proposed 2015 qualifying criteria. It was suggested that this recognition would occur "across all major sizes" but in fact only 3 models in the 50+ inches category would qualify.

The explanation for the low qualification rate for 50+ inch models is evident in Slide #27 from the September 4th webinar, which shows that the 2015 qualification criteria as a function of screen size does not follow the same curved trajectory as in previous years. Instead, the 2015 criteria is nearly a straight line, thus excluding almost all of the 50+ inch models.

We applaud the fact that televisions are continuing to improve their energy efficiency and recognize that the 2015 criteria should be at a lower power compared to 2014. However, we feel an effort should be made to more fairly represent larger size models. Industry sales projections show that 50+ inch models will continue to be highly popular with customers, thus expanding their recognition in the ENERGY STAR Most Efficient TVs program to be on par with other size models will offer consumers' guidance in making an informed purchase.

We would also like to point out that the ENERGY STAR TVs Version 7 Draft 2 has modified its On-Mode power criteria to be based on a revised qualified product dataset which only includes models with ABC enabled by default that were certified to ENERGY STAR Version 6.1 and tested to the Final Rule DOE Test procedure. This resulted in a revised higher Maximum On Mode Power requirement. We recommend that this same revised dataset be used to develop the ENERGY STAR Most Efficient 2015 qualifying criteria.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with EPA has provided a valuable tool by which consumers can make better informed choices about their purchases of energy efficient products.

As always, Panasonic appreciates the opportunity to comment on the ENERGY STAR Most Efficient 2015 and welcomes the opportunity to further discuss our views with you.

Sincerely,

Mark J. Sharp
Group Manager