



Consumer Electronics Association

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April 6, 2010

Ms. Ann Bailey
U.S. Environmental Protection Agency
Office of Air and Radiation
1310 L Street, NW
Washington, DC 20005

Subject: Proposal for ENERGY STAR Most Efficient program

Dear Ms. Bailey:

On behalf of the Consumer Electronics Association (CEA), thank you for the opportunity to comment on the latest proposal for an ENERGY STAR Most Efficient program. The new proposals for the Most Efficient recognition criteria and the point-of-purchase marketing template are outlined in a memo from the EPA dated March 16, 2011.

CEA is the preeminent trade association promoting growth in the \$186 billion U.S. consumer electronics industry. More than 2,000 companies enjoy the benefits of CEA membership, including legislative advocacy, market research, technical training and education, industry promotion, standards development and the fostering of business and strategic relationships. CEA also sponsors and manages the International CES – The Global Stage for Innovation.

Since early 2010, CEA has raised valid questions regarding the impact of a Most Efficient program on the basic ENERGY STAR brand and its implementation in the marketplace. Consumer confusion, especially with respect to new or differentiated product labeling, is of particular concern and interest. There remain mixed feelings among ENERGY STAR program partners about the potential benefits or drawbacks of a Most Efficient program.

In earlier comments, CEA suggested that the EPA explore other ideas to identify and advance highly efficient products and encourage their availability in the marketplace more quickly. CEA is not aware that the EPA has studied or conducted research on alternatives to a Most Efficient program, including alternatives that could be less costly for the EPA to administer.

In general, CEA believes the EPA's focus should be on improvement of the existing ENERGY STAR brand, including potential expansion to new products and services.

If the EPA moves forward with the Most Efficient program, we recommend a stakeholder-driven process to identify the criteria that will be considered in recognizing Most Efficient products. Unfortunately it is unclear how the EPA selected which products to include in the pilot program now contemplated. Further, the performance criteria remain vague and undefined.

CEA member companies have a strong interest in the continued success of the ENERGY STAR program. We strongly support efforts to maintain the integrity and value of the ENERGY STAR designation in the rapidly evolving consumer electronics marketplace.

As always, please do not hesitate to contact us if you have any questions or need more information.

Sincerely,

/s/
Bill Belt
Senior Director, Technology & Standards

/s/
Douglas Johnson
Vice President, Technology Policy