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Ms. Ann Bailey  
Director, ENERGY STAR Product Labeling  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[bailey.ann@epa.gov](mailto:bailey.ann@epa.gov)

[mostefficient@energystar.gov](mailto:mostefficient@energystar.gov)

**Re: Panasonic Comments on ENERGY STAR Most Efficient 2011 Proposed Recognition**

Panasonic Corporation of North America (“Panasonic”), a leader in the manufacture and sale of flat panel and other television technologies, appreciates the opportunity to comment on proposed ENERGY STAR Most Efficient 2011 recognition as applied to televisions. As a longtime and leading proponent of the ENERGY STAR Program and in particular its Televisions category, Panasonic regrets it cannot support this proposal for reasons outlined below.

**Most Efficient Designation Will Dilute ENERGY STAR Brand**

The EPA and its program partners are justifiably proud of the growing public recognition (now above 80%) and marketplace impact of the ENERGY STAR brand. ENERGY STAR’s transformation of consumer, business, and government purchase decisions is in part based on the program’s easily understood message of energy efficiency. Any segmentation of the ENERGY STAR brand into additional categories, as mandated under the “Most Efficient 2011” pilot program, would produce widespread confusion in the marketplace and jeopardize the gains in modified consumer behavior achieved over many years.

By inference, any ENERGY STAR product not designated as “Most Efficient 2011” will be viewed as less efficient and possibly inferior despite dedicated promotion planned for its implementation. Consumers will likely view the “Most Efficient 2011” products in retail environments along side other ENERGY STAR-labeled products. When comparing products, consumers will likely view the ENERGY STAR-labeled products as less desirable, perhaps even lower in performance or quality. By definition, consumers are told to expect no compromise in product performance for ENERGY STAR but the lack of a “Most Efficient 2011” designation will imply a lesser performing product.

## **Most Efficient Designation for Televisions Will Discriminate Against Technology Types**

Current and future ENERGY STAR Televisions specifications continue to perpetuate a fundamental flaw by not separating products by technology type. In effect, the ENERGY STAR program's stated objective of being "technology neutral" is undermined by the deliberate setting of criteria that can only presently be met by a single technology type.

Panasonic and several other television manufacturers have repeatedly contended that only one technology type (LED-backlit LCD Televisions) can achieve the ENERGY STAR Televisions version 5.3 criteria scheduled to take effect on September 30, 2011, in the larger sizes (above 50 inches). Further, no currently television model larger than 55 inches, to our knowledge, can qualify under the ENERGY STAR version 5.3 designation

Designating televisions as "Most Efficient 2011" would further exacerbate this disparity because the new subset of ENERGY STAR will undoubtedly consist only of LED-backlit LCD televisions and will lack any models in the largest size categories.

## **ENERGY STAR Televisions Category Focus on Energy Consumption, Not Efficiency**

The ENERGY STAR message of saving energy would be complicated by the creation of a "Most Efficient 2011" subset. This is particularly disruptive in the televisions category, where consumers are led to believe that ENERGY STAR qualified televisions are among the most efficient models available. Yet consumers have no way to know that the ENERGY STAR version 5.3 specification is based on total energy consumption, not the television's efficiency. Highly efficient, larger- size televisions must meet criteria linked to units with a display area 35-70% smaller.<sup>1</sup>

By creating the televisions subset, EPA will exacerbate this disparity as only LED-backlit LCD televisions under 56 inches in size will have any chance to meet the proposed criteria as "Most Efficient 2011."

Panasonic is proud that its larger size plasma display televisions have achieved tremendous improvements in power consumption. In fact, our new 55-inch models consume just 119 watts, down from about 293 watts in 2009. Most consumers would arguably consider 119 watts exceptionally efficient yet the proposed criteria would set the qualification bar unreasonably high and virtually unattainable in this product size.

Although the EPA acknowledges the Most Efficient 2011 designation will not be available for all configurations or sizes, this position unfairly penalizes manufacturers of the larger size televisions and deprives consumers wanting a large size model the ability to make better informed choices. Simply excluding large televisions because their power consumption is higher, in our view, does not represent sound public policy.

<sup>1</sup> Comparison based on 50-inch (1068 inches<sup>2</sup>) with 58 (1437 inches<sup>2</sup>) and 65-inch (1809 inches<sup>2</sup>) TVs

### **ENERGY STAR Television Specifications Have Already Twice Been Rapidly Accelerated**

The “Most Efficient 2011” proposal ignores the recent acceleration in effective dates for ENERGY STAR-qualified televisions. Since the ENERGY STAR Televisions specification was initially modified to include on-mode power consumption, its effective dates have been moved up twice by a total of 11 months.<sup>2</sup>

Consequently, the ENERGY STAR Televisions specification (version 5.3) is arguably more closely tied to the current marketplace than any other ENERGY STAR product category. This marketplace linkage is consistent with EPA’s stated desire to refresh specifications, keeping them robust and providing meaningful differentiation. A further segmentation of the televisions category through a “Most Efficient 2011” designation is unnecessary and would be counterproductive in terms of key messaging to consumers.

In summary, Panasonic continues to be a dedicated ENERGY STAR Program Partner and advocate. We do, however, have strong concerns about the impact created by unnecessary and in our view, discriminatory, additional program segmentation as proposed by the “Most Efficient 2011” designation for televisions.

We welcome the opportunity to further discuss our views on the “Most Efficient 2011” pilot proposal and appreciate your consideration of our comments. Let me know if you have any questions.

Sincerely,

Mark J. Sharp  
Group Manager  
Corporate Environmental Department

cc: Katharine Kaplan

<sup>2</sup> ENERGY STAR TVs version 4.3 (Tier 2 v. 3.0) took effect May 1, 2010 but originally scheduled effective date was September 1, 2010. ENERGY STAR TVs version 5.3 will take effect September 30, 2011 but originally scheduled to take effect May 1, 2012.