

EPA Most Efficient March 2011 Proposal for Televisions: Stakeholder Comments and EPA Responses

Comment	EPA Response
<p>A commenter recommends alternative Most Efficient criteria:</p> <p>Proposal 1:</p> <ul style="list-style-type: none"> - $P_{max} = (0.073 * A) + 2.0$ (W); where $A \leq 1068$ - $P_{max} = (0.040 * A) + 37.2$ (W); where $1068 < A \leq 1770$ - $P_{max} = 108$ (W); where $A > 1770$ <p>Proposal 2:</p> <ul style="list-style-type: none"> - $P_{max} = (0.0073 * A) + 2.0$ <p>Proposal 3:</p> <ul style="list-style-type: none"> - "Percentage Improvement" better than ENERGY STAR levels 	<p>While EPA appreciates proposed alternative criteria, EPA's proposal meets the objectives of the program, while more relaxed criteria do not. EPA's stated principles for the Most efficient program include that criteria would recognize truly exceptional efficiency performance. Eligible products must demonstrate efficiency performance that is truly exceptional, inspirational, or leading edge—consistent with the interests of environmentally-motivated consumers and early adopters. A second principle is the concept that recognition may not be available for all configurations or sizes. Given the role Most Efficient recognition is intended to play relative to the ENERGY STAR label and given the target audience, it is not the goal of the program to ensure that there are qualifying models in all configurations or sizes.</p>
<p>Since Most Efficient is not available for all configurations or sizes, a commenter noted that consumers wanting a large TV will not have the ability to make informed choices. This makes it less likely that the consumer will give energy efficiency as much weight when shopping in the large TV category.</p> <p>Another commenter noted that the proposed "Most Efficient" program has a cap that starts at 50-inches. This implies that televisions over 50-inches in size are "bad" or "undesirable". TV manufacturers put their most advanced - and often most efficient - technologies into their largest televisions. ENERGY STAR should promote efficient devices, not merely those which consume the least amount of power. In particular, treating televisions larger than 50" differently from smaller sets discriminates against the most efficient class of televisions available. The proposed 80 W cap is inconsistent with the program title of "Most Efficient". A 70-inch television that consumes only 80 W would be roughly twice as efficient as a 50-inch, 80 W TV.</p>	<p>EPA applauds the strides manufacturers have made in bringing down the power of even larger televisions. EPA also looks forward to recognizing, through this Most Efficient pilot program, a number of televisions that are greater than 50 inches. Most Efficient is intended to recognize those ENERGY STAR qualified products that offer consumers the most substantial energy savings.</p>

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A commenter offered that the Most Efficient criteria are biased towards large televisions. This runs counter to the overall objective of ENERGY STAR to reduce energy use and discourage unnecessarily larger appliances. Suggest EPA develop recognition levels that cover a broader range of product sizes to discourage consumers from purchasing larger TVs than needed.	In an effort to recognize those products that are inherently less energy intensive, EPA has revised its originally proposed recognition levels so that a few additional smaller models that offer the most energy savings can be recognized.
A commenter expressed concern that manufacturers may reduce luminance levels to meet the Most Efficient criteria undermining the program and the principle of ensuring no compromise in product performance and urged EPA to consider ways to address this issue. Luminance will become increasingly important for ENERGY STAR to address in a new way as the competition for "Most Efficient" intensifies. The test procedure and associated efficiency specifications need to encourage luminance levels that are high enough to ensure good picture quality across a range of room luminance conditions, but not so high that they consume too much energy and yield an overly bright picture.	Test procedure addresses luminance in home mode as a percentage of luminance in retail mode. Products are recognized as Most Efficient after they are ENERGY STAR qualified and therefore do not need to undergo additional or different test procedures. Further, EPA did review consumer feedback on televisions that are currently on the ENERGY STAR qualified product list and meet the Most Efficient criteria and found no consumer complaints. EPA will continue this practice.
Another commenter noted that the "Most Efficient 2011" proposal is not sensitive to the recent acceleration in effective dates for ENERGY STAR-qualified televisions.	EPA applauds the strides manufacturers have made in bringing down the power of even larger televisions. While EPA has worked with stakeholders to accelerate the 5.3 effective date, the V5.3 specification, when in effect, will continue to recognize a much larger percentage of the market than Most Efficient is designed to recognize. Most Efficient is designed to compliment the ENERGY STAR program by highlighting for environmentally-motivated consumers and early adopters the truly exceptional, inspirational, or leading edge televisions.
A commenter highlighted that incentive programs aim for delivery to retailers in early September for consideration during stocking discussions in the fall. New TV models are typically introduced during the months of April and May. This commenter requested that the EPA eliminate the year designation on the signage, as it will reduce the program's impact for up to 25% of the lifecycle. To be most effective, they asked that the EPA consider the TV lifecycle when determining the timeline for when new products and specifications are announced. Annual updating of televisions is not frequent enough to keep track of the rapid pace at which new television technologies are entering the marketplace.	2011 is a pilot year allowing EPA to evaluate criteria, frequency with which they are issued, when they are issued, and how consumers respond, among other things. Should the program move forward, EPA will improve the program based on the findings from this pilot year.

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<p>A commenter shared that only one technology type (LED-backlit LCD Televisions) can achieve the ENERGY STAR Televisions version 5.3 criteria for sizes above 50 inches. The commenter added that 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. This undermines the program objective of being "technology neutral".</p>	<p>While the proposed criteria are open to all technology types, EPA acknowledges that at this time, televisions that meet the criteria are all LCDs and are mostly LED back-lit. LCDs do dominate new ENERGY STAR submissions and LED back-lit models are now a large segment of the US market, however. Finally, Most Efficient is not designed to recognize all types, sizes, or configurations of televisions.</p>