

ENERGY STAR® Revisions to TV/VCR Specifications

EPA's Response to Industry's Position (October 2001)

Below is EPA's response to each of the proposals put forth by industry in writing at the October 3, 2001 meeting between TV/VCR manufacturers and EPA. ENERGY STAR®'s Draft 2 of the Revised Specification for TVs, VCRs, and Combination Products will follow shortly. EPA believes industry input is critical to the success of ENERGY STAR and sincerely appreciates industry's time and thoughtful suggestions on this revised energy-efficiency specification.

1. At this time, there should only be a single standby mode (e.g., no Tier I/Tier II approach).

Industry Reason: Because of the maturity of video products, there should only be a single specification level.

EPA Response: EPA respectfully disagrees and continues to believe its proposed Phase II specifications are both reasonable and fair. To address industry concerns, however, EPA is willing to do the following:

- Delay the effective date of Phase II until July 1, 2005; and
- Provide specific language addressing a review of the Phase II specifications prior to their implementation: "In July 2004 (one year prior to the Phase II effective date), ENERGY STAR will begin a review of the Phase II specification (i.e., 1 watt or less). During this evaluation process, ENERGY STAR will assess the market in terms of energy efficiency and new technology. Prior to and during this time frame, industry will have an opportunity to share its data, submit proposals, and voice any concerns. If necessary, the Phase II specification will be revised and reissued so that it recognizes the most energy-efficient models and rewards those manufacturers who have made efforts to further improve efficiency."

2. The effective date of the new specification should be July 1, 2002.

Industry Reason: So long as there are no changes to the grandfathering clause, an implementation date of July 1, 2002 is acceptable.

EPA Response: EPA is amenable to a July 1, 2002 effective date for Phase I.

3. Because "download acquisition mode" is essentially an active mode, there should be no specification for televisions with EPGs.

EPA Response: After much discussion on October 3, industry tentatively agreed to move forward with EPA's idea of forming an Industry Working Group for EPG products. CEA and EIA agreed to talk to all of their members to confirm that the Working Group idea is acceptable. EPA strongly believes that an energy-efficiency specification for EPG models is warranted, but will continue this effort on a separate track from the rest of the TV/VCR specifications. EPA hopes to have a final EPG specification by March 1, 2002 with an effective date to be determined with industry.

EPA would like to thank industry for its written responses to EPA's EPG questions. Further discussion of this issue will be pursued through the EPG Industry Working Group.

4. Industry Proposal for Revised Specifications

1. Industry Response:

Product	Standby Mode
TVs (not including TVs with EPG)	2 watts
VCRs	3 watts
Combination Units	4 watts

2. Industry Response: No change to existing grandfathering clause.

EPA Response: Provided that industry agrees to a Phase II specification, EPA is willing to accept industry's proposal of 4 watts for Combination Units. In addition, EPA would like to pursue the option of two separate specifications for TVs (analog and digital), as proposed and discussed on October 3. Finally, EPA continues to believe 2 watts is an appropriate specification for VCRs, particularly given that approximately 95 percent of units sold between January and April 2001 met the current 4-watt specification. Below is Draft 2 of the revised TV/VCR specifications for industry review.

<i>Table 1: Energy-Efficiency Criteria for ENERGY STAR Qualified TVs, VCRs, TV/VCRs, TV/DVDs, and TV/VCR/DVDs.</i>		
Product Type	Phase I Standby Mode (7/1/02 – 6/30/05)	Phase II Standby Mode (effective 7/1/05)
TV	Analog: ≤ 1 Watt Digital: ≤ 3 Watts	≤ 1 Watt
VCR	≤ 2 Watts	≤ 1 Watt
TV/VCR, TV/DVD, and TV/VCR/DVD Combinations	≤ 4 Watts	≤ 1 Watt

5. Industry strongly opposes the EPA's new approach to grandfathering labeled products.

Industry Reason: If a product model does not change, it should remain ENERGY STAR compliant, regardless of changes in the specifications. The new ENERGY STAR policy will create more confusion for consumers, rather than less. The policy will result in two identical products being labeled differently on store shelves (i.e., one ENERGY STAR labeled, one not). Once a product is labeled as ENERGY STAR compliant, it should stay compliant over its product life.

EPA Response: EPA is willing to revise the proposed grandfathering language for the TV/VCR industry. Based on suggestions received during the October 3 meeting, EPA proposes that the old grandfathering language be used with a **time limitation of one year** for Phase I models to continue to carry the label after Phase II takes effect.

“The second phase of this specification, Phase II, shall commence on July 1, 2005. Specifications for Phase II shall apply to products that the Partner begins to ship after June 30, 2005. However, once an individual product model is qualified by the Partner as ENERGY STAR, the model, packaging, or other product-related materials may continue to bear the ENERGY STAR logo until the model is phased out of the market or until June 30, 2006 (one year after the new specifications take effect), based on whichever comes first.”

EPA welcomes industry feedback and suggestions.