

Dear Kathleen,

Thank you for your continued diligence toward developing a more thorough specification for this broad set of products classified as A/V products. We think the bulk of the draft 2 specification is headed in the right direction.

A remaining concern we have is with the APD qualification. As currently constructed, the qualification allows for Idle State power consumption to continue in perpetuity. We think it is within the bounds of a consumer's user preference and the ability of industry, to not allow eligibility to products with APD disabling options, and instead have APD limit set at 4 hours. We think this non-disabling APD requirement should be required for the "consumer AV" category Tier 2. For professional/commercial AV products, we think this non-disabling requirement should go into effect for Tier 3.

Below is how the current APD >2 hours option could be amended:

(Starting on Line 306)

"Mandatory Auto-Power Down: To qualify for ENERGY STAR, all products must offer APD functionality that is enabled by default. ... Manufacturers may offer users the option (via system menu, DIP-switch, or other means) to modify APD timing in 30 minute intervals ~~or to disable APD entirely~~ *up to a 4 hour limit*.

"APD >= 2 hours: ~~If APD can be disabled, or~~ If APD timing can be set to greater than 2 hours, products must meet Idle state power consumption requirements *up to the 4 hour limit*.

I am available for follow-up next week (212) 727-4606 or my email, pbull@nrdc.org, should you want to discuss further.

Thank you,
Pierre

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