



18 June 2009

Ms. Kathleen Vokes  
US EPA  
Climate Protection Partnership Division  
ENERGY STAR Program  
1200 Pennsylvania Ave NW  
Washington, DC 20460

Dear Ms. Vokes:

InfoComm and its 5,000 member companies are committed to energy efficiency and sustainability within the commercial AV industry. However the commercial AV industry is not the same as the consumer AV industry and for the Energy Star program to be successful it needs to recognize the difference as it does with other electrical and electronic products. The Energy Star program needs also to recognize that commercial AV products are sold to be used in systems and that any comprehensive approach to energy savings will both recognize this configuration and take advantage of it to produce a total energy savings program for all AV.

While many consumer-grade AV products provide excellent solutions for home entertainment, they are often unsuitable for use in commercial environments that demand higher performance capabilities. A somewhat simplistic but very real example is that the power amplifier used at a large sports arena is different than the model in someone's home theatre. It is different in specification and application. A similar example is a power amplifier in an airport that may not be a lot more powerful than a home model but it must be constantly ready to function as it serves as a means of notifying people of the ordinary activities and emergency notification at an airport.

The need for high reliability in adverse environmental conditions and fail-safe facilities lowers the On-State energy efficiency of some commercial grade AV equipment. Commercial grade equipment is designed to operate continuously *24 hours per day, 7 days per week (vs. 6-8 hours per day for consumer grade products)*. Many government, military, health care, and commercial/industrial venues require this type of continuous readiness as a basic operational requirement. Active controls (RS232, Ethernet) are necessary to ensure the system is available for use when required. Military or industrial command and control centers, government conference or briefing rooms, hospital operating rooms, corporate training centers, performing arts venues, gaming floors, commercial broadcasting facilities, and many more all require immediate and continuous equipment response. It is not like sitting down in a home theatre and turning it on and only waiting for a couple of pieces of equipment to power up and synchronize.

Commercial equipment may also contain internal scheduling of events using real-time clocks where the equipment may turn itself on to perform a task which requires some level of continuous power to the device's motherboard. Similarly many AV devices require remote diagnostics to ensure they are functioning properly and are available when needed. These

remote diagnostics queries also require a continuous level of power to internal monitoring electronics.

The continuous activation of internal electronics such as control, signal and monitoring electronics is a key energy differentiator between commercial and consumer equipment which makes it impossible for this class of equipment to meet the Energy Star <1 watt standby requirement. The imperative to maintain these distinctions between commercial and consumer AV is not one of trade or market differentiators but of application.

With a clear recognition of the distinction between commercial and consumer products, the Energy Star rating system will avoid the pitfall of promoting the use of inappropriate electronics in business, healthcare, military, government, education and numerous other professional applications. It will not be the source of catastrophic failure of these communication and information-sharing systems simply because the EPA Energy Star label was on a consumer good and it was for that reason the purchaser ignores the need for a professional product.

The EPA recognizes the distinction between consumer and commercial ratings for equipment such as lighting, HVAC, appliances, and computer equipment and InfoComm and its members are requesting that a similar program be set up for the Audio Video Energy Star program. InfoComm and its members stand ready to work with EPA to clearly define a commercial AV product from a consumer product.

InfoComm also wants to work with the EPA to establish an AV Systems ENERGY STAR program. The InfoComm Board has charged its ANSI Standards Committee to pursue the establishment of an energy management standard. Such a standard will produce a total measurement of energy in an AV system and point the direction for saving energy. We are very enthused about this approach to sustainable AV systems and think it fits nicely with the ENERGY STAR Home program and other systems approaches to energy savings currently within the EPA. Our Standards Planning committee is moving to develop this ANSI standard with industry experts and produce a document that both establish the standard and a means to test compliance. InfoComm proposes to engage with EPA on this approach and get guidance for how it can extend the reach of your energy savings programs from a product only focus to a whole system approach.

Sincerely,

A handwritten signature in black ink that reads "Randal A. Lemke". The signature is fluid and cursive, with the first name being the most prominent.

Randal A. Lemke, Ph.D.  
Executive Director  
InfoComm International