



November 12th, 2008

Re: Comments on ENERGY STAR DISPLAY Draft 2 (Version 5) Program Requirements

To whom it may concern,

We, Eizo Nanao corporation, a manufacturer and sale of flat panel monitors are very pleased to gain the opportunity to make comments on the ENERGY STAR display draft 2 Version 5.0 requirements. We have read several of the documents pertaining of the proposed revisions to the Energy Star Version 5.0. While we have recognized the improvements that have made from the 1st draft, we are still concerned with some of new EPA's propositions noted below,

1) Labeling

i) Labeling Requirements

We are aware that labeling requirements have been newly introduced to mandatory requirements in the draft. We have recognized the importance of the Energy Star mark because it is a mean of indicating a product is an Energy Star qualified product at the time a potential customer is considering purchasing a product. We disagree against the proposition of displaying the Energy Star mark on the products since significant frequency of labels could cause harmful influences on the environment. Moreover, the width of display bezels is becoming narrower and narrower nowadays. Hence, it is difficult to keep the space to label more marks. We suppose this is a contradicting proposition to EPA's mission, protecting the environment. Because of these reasons, we insist that the labeling requirement should stay as an optional requirement.

2) Tier 1 On Mode requirements

Compared to the On Mode requirements from the Draft 1, we suppose that this is too strict for most displays to adopt. In fact, most of our monitors, and even other manufacturers' monitors would not be able to meet the tier 1 on mode requirements proposed in this Draft 2 while EPA insists that approximately 23% of display models would be able to meet the Tier 1 on mode requirements for this Draft. We do not see the points why the on mode requirements have to be tightened this much. The requirements should be revised with consideration of actual capacities of modern displays.

3) Accreditation requirements for laboratories associated with product qualification

By starting this new requirement, the display must be tested in laboratory accreditation cooperation. We understand that the major points of this proposition is to conduct testing in support of qualification for ENERGY STAR. However, this would undoubtedly lead to strong cost pressure and time-consuming for the all partners as a consequence. Our suggestion for this proposition is to allow the partner with ISO/IEC 17025 accredited laboratories to test in the laboratory. We strongly believe that this proposition should be eased for all the partners, too.

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4) Luminance Test Patterns and Procedures

Another thing is the luminance test patterns and procedures. We strongly believe that the testing point for luminance should be at the center of monitors. During the luminance test, normally we set up the testing point finding the area that provides at least 175 cd/m^2 . During the process, there is a strong possibility to make mistakes even when finding the minimum number for this testing because the numerical value of luminance varies from the center of a monitor to the corner. As a result, the results from the same testing might vary among the testing agency. Moreover, since finding the area that provides at least 175 cd/m^2 is not a simple procedure, we need to spend so much time on this. Because of these reasons, we suggest that the testing point for luminance should be at the center of monitors for the facilitation and accuracy of luminance test patterns and procedures for shortening of hours.

5) Extension of effective withdrawal date of version 4.1

We have recognized remarkable changes introduced to this draft 2; Version 5.0 from the current specification, Version 4.1 and suppose that many displays would not be able to meet the new requirement. Therefore, EPA should extend effective withdrawal date of version 4.1 and establishing some years transition period from Ver.4.1 to 5.0. By running both two version of specifications for a certain period of time (just like TCO standards has carried out the extension of effective withdrawal date for switching to '03 from '99), more display would be able to meet the new requirement smoothly with less difficulties.

6) Power requirements of PC Display interfaces

We have been aware that EPA is planning to evaluate the power consumption requirements of multiple PC Display interfaces in each mode of operation. We suggest only widely used interfaces such as VGA and DVI are should be targeted and specified for new requirements since many of today's standard computer monitors are sold with these PC Display interfaces.

7) Requirements for the models with automatic brightness control (ABC)

We have recognized that requirements on the models with automatic brightness control have been newly added to the Energy Star specification. In the draft, it was not clarified whether a display with ABC had to be confirmed to both ON mode requirements on different luminance settings (100 cd/m^2 , 175 cd/m^2 , 200 cd/m^2 , and 350 cd/m^2) and ABC related requirements or only with the requirements on the displays with ABC functions. It might cause misinterpretations among the partners. The requirements should be specified again for better understandings.

Eizo Nanao Corporation appreciates the opportunity to comment on the ENERGY STAR display draft and would be pleased to discuss this in detail at your convenience. We look forward to continuing to work with EPA on the development of this specification.

Sincerely,

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