

January 16, 2009

Mr. Christopher Kent
EPA Product Manager
ENERGY STAR Product Specification Development
U.S. Environmental Protection Agency
Climate Protection Partnerships Division ENERGY STAR - MS 6202J 1200 Pennsylvania Avenue, NW
Washington, DC 20450

Sent via electronic mail
kent.christopher@epa.gov

Dear Mr. Kent:

Panasonic, the leading provider of professional plasma displays used in hospitality, education, broadcast studios, entertainment, and digital signage applications, appreciates the opportunity to comment on the ENERGY STAR Displays Version 5.0 draft final specification.

As we have previously commented to ENERGY STAR, most of the applications for which our professional displays are commonly used do not require high APLs, thus obviating the need for a measurement using computer-generated input signals. Thus, we agree with EPA's decision that the measurement protocol be based on the IEC 62087 test procedure, not the VESA based method.

Panasonic models sold to the hospitality industry, bars, restaurants, and broadcast studios are sometimes sold without installed tuners, making these applications more appropriate for coverage under the ENERGY STAR TVs 3.0 specification. In many cases, these applications are complemented with set top boxes using HDMI or HD-SDI inputs, allowing for "tuner-free" use. As you know, ENERGY STAR qualified set top boxes are now widely available, which should further contribute to energy savings when paired with our ENERGY STAR qualified TVs.

Some customers request a "slide-in" slot card that is used to allow functional flexibility and accommodate specified tuners. When equipped with a tuner, the professional display will consume additional energy, when compared with displays not similarly equipped. Therefore, an allowance for the tuner is necessary in the specification to enable end users preferring this type of application to still be able to purchase ENERGY STAR qualifying models. Panasonic recommends an allowance of 40 watts to allow for this form of application.

Again, it is important that EPA recognize expansion slots for tuners allow for input of video signals, not computer generated inputs. Thus, this application should be allowed to use the TVs Version 3.0 specification to determine ENERGY STAR qualification.

Consistent with specified applications being treated as TVs for purposes of ENERGY STAR qualification, internet content video should not be included for on mode testing. Typically, internet content is not used in this type of application, which is not computer input driven.

In addition, Panasonic supports an allowance for the testing condition using factory default settings with a “forced menu” option. This allowance is consistent with the TVs Version 3.0 specification and will help to ensure all models are tested in equivalent settings. It will also likely spur additional energy savings as end users upon setup will need to actively set the unit’s power consumption, and often opt for a lower power-consuming option (typically known as standard brightness levels) offered as a means to most efficiently operate the unit.

Finally, Panasonic strongly recommends that EPA not establish any parameters for luminance. When used for plasma televisions, luminance measurements using four static signals, inherently vary considerably (APL variance between 1%-30%), thus creating unfair and adverse consequences. Simply stated, luminance parameters cannot equitably be used to compare different technologies (especially LCD and PDP). Also, any required or recommended luminance levels would need to vary considerably by application, purpose, circumstance, or content. For this reason, we recommend against any prescribed levels for luminance.

Again, Panasonic greatly appreciates the flexibility shown by EPA to date in agreeing to further examine and consider the unique differences in operating characteristics among technologies popularly used in the broad category of professional displays.

We appreciate your consideration of our comments, and we would be pleased to discuss them further, at your convenience.

Sincerely,

Mark J. Sharp
Corporate Environmental Department
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cc: Ms. Katharine Kaplan, ENERGY STAR Labeling Branch, EPA
Joshua Forgotson, ICF International (EPA contractor)