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July 7, 2009

Ms. Katharine Kaplan
ENERGY STAR Product Development
U.S. Environmental Protection Agency
1310 L Street, NW
Washington, DC 20460

Subject: ENERGY STAR TV Specification, Draft 2 Versions 4.0 and 5.0

Dear Ms. Kaplan:

Thank you for the opportunity to comment on the ENERGY STAR TV Specification, Draft 2 Versions 4.0 and 5.0 proposal. The Consumer Electronics Association is the preeminent trade association promoting growth in the \$172 billion U.S. consumer electronics industry. More than 2,200 companies enjoy the benefits of CEA membership, including legislative advocacy, market research, technical training and education, industry promotion and the fostering of business and strategic relationships. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute televisions, with standard and advanced features, across all technology platforms.

As a long-time partner in energy efficiency, the consumer electronics industry is committed to the further success of the ENERGY STAR program. In particular, the existing TV specifications cover a large number of television models with a wide range of features and is therefore well suited for comment and input from CEA. We offer the following comments to guide Versions 4.0 and 5.0 of the ENERGY STAR TV Specification as it is further developed.

Luminance

Section 3(D) of the draft specification notes the EPA's significant interest in ensuring that products are tested and qualified as ENERGY STAR in the mode in which they will ultimately be viewed in the home. The EPA indicates its interest in taking steps to help prevent unsatisfactory viewing experiences driving consumers to choose a more consumptive mode than that in which their television was qualified as ENERGY STAR.

CEA continues to strongly oppose a luminance requirement as unnecessary and premature. As stated in previous comments, CEA members share a keen interest in preserving the high level of consumer satisfaction that has long characterized the television industry. Indeed, if consumers were unhappy with the default brightness settings of their newly purchased televisions, we would have heard it directly from our customers by now. All major TV

manufacturers operate customer support call centers. We are unaware of any increased call volume to these centers that can be traced to an unsatisfactory customer experience tied to default brightness levels. Moreover, retailers have not reported any increase in customer returns that can be traced to unsatisfactory default brightness levels.

Customer satisfaction clearly remains the number one goal of television manufacturers. As such, manufacturers have a strong self interest in ensuring that TVs are sold with a default brightness level appropriate for home viewing. In the absence of complaints to TV manufacturers and TV retailers, there does not appear to be a problem with default brightness levels. Thus, any proposal to impose limits on luminance and/or tie luminance levels to power levels is, at best, premature. Manufacturers will continue to monitor customer satisfaction with their products, including ENERGY STAR qualified products, and customer feedback will serve as an “early warning” if televisions are being shipped with default brightness levels that are too low. This marketplace feedback situation is ideal – manufacturers have in place a direct mechanism where consumer satisfaction and comments directly drives product settings and features; this mechanism is much more responsive and agile than an ENERGY STAR-mandated approach.

We continue to recommend that Version 4.0 not include luminance criteria and instead revisit this feature when finalizing the Version 5.0 Specification (currently scheduled to become effective May 1, 2012). This should allow adequate time from the inception of the Version 3.0 Specification in November 2008 to carefully evaluate customer satisfaction with the ENERGY STAR TV program and make any necessary changes or adjustments.

We also note the absence of standardized test procedures for measuring luminance. The EPA’s proposed test procedure contained in Section 4(F) states that all luminance measurements must be performed in dark room conditions. However, it is not feasible for TVs with Automatic Brightness Controls (ABC) to meet the 65% luminance requirement if luminance in “Home” mode is measured in a dark room. If luminance is included in Version 4.0, CEA proposes an alternate method for measuring the luminance of TVs with ABC. Specifically, TVs with ABC should be tested at 300 lux or with ABC disabled.

Download Acquisition Mode (DAM)

Section 3(E) of the draft specification allows TVs to automatically exit the Sleep Mode according to a predefined schedule to communicate through a network protocol. The specification limits the additional maximum allowable energy level when in DAM to 20 watt-hours per 24 hour period. As noted during the stakeholders’ meeting on July 2, 2009, this limitation is insufficient to meet the needs of the services currently offered, and anticipated for future offering, by the DAM feature.

CEA continues to propose that total DAM power consumption limits be no lower than 80 watt-hours in a 24 hour period. This allowance is equivalent to the power consumption of the current typical configuration for DAM mode: 20 watts for normal operation during DAM mode, and DAM time requirements of four hours in a 24 hour period. While all stakeholders agree that no hard data is available to help guide the setting of this limitation, we believe the 80 watt-hours per 24 hour benchmark is reasonable as industry continues to explore additional features such as an opt-out function and as the DAM services mature.

On Mode Power Consumption

CEA is concerned that the proposed On Mode power limit contemplated for Version 4.0 favors the qualification of small screen sizes at the expense of larger sizes. As noted by several stakeholders, the On Mode power consumption limit equation currently proposed in Draft 2 is dramatically weighted towards smaller TVs. Over 80% of the televisions 23 inches or smaller qualify under the proposed limit. Yet less than 10% of the TVs over 23 inches qualify. In fact, in the category of large TVs of over 60 inches, only rear-projection TVs qualify.

As CEA has noted in the past, the EPA's technology-neutral stance, long advocated by the Agency, is threatened by the proposed equation's leniency with respect to smaller TVs and strong bias against larger TVs. The ENERGY STAR program's goal must be to optimize energy savings across all screen sizes, thereby giving consumers appropriate guidance when making energy-wise purchasing decisions for any television size category.

CEA suggests a new On Mode power consumption limit equation to resolve this inequity. The CEA proposal adjusts the equation by lowering the y-intercept and increasing the slope of the line. Specifically, we recommend a maximum On Mode power consumption equation of $P=0.17A+5$, where P is the maximum On Mode power (in watts) and A is the viewable screen area (in square inches). This equation equitably balances eligibility rates across the full range of television screen sizes. Approximately 27% of the televisions 23 inches or smaller qualify under the CEA proposed limit while approximately 19% of the TVs over 23 inches qualify.

Importantly, under the CEA proposal, the overall qualification rate for all televisions is 20%. This overall qualification rate is more stringent than the proposed EPA qualification rate of 25%, thus providing a buffer between the time the specification is finalized and its effective date. The buffer will ensure that the qualification rate when the program becomes effective is closer to the desired 25% eligibility rate, accounting for the rapid development of energy saving improvements as seen during development of the Version 3.0 Specification.

CEA strongly urges the EPA to properly align the On Mode power consumption limit with the ENERGY STAR program goals. The CEA proposal will equitably balance ENERGY STAR qualification rates across the broad range of TV sizes while ensuring a best-in-class reward.

With regard to the Version 5.0 eligibility criteria proposed to become effective on May 1, 2012 CEA believes that it is premature to set an On Mode limit with an effective date almost three years in the future. As noted previously, the television market is currently in a very dynamic design cycle. It is extremely difficult to predict what an appropriate On Mode limit should be to meet ENERGY STAR program goals in 2012. CEA again suggests that it would be more appropriate to review the available data at a later date, perhaps 12 months before the proposed effective date, and set a limit at that time.

Display Power Management Signaling

Section 1(A) of the draft specification states that televisions with a computer input port may qualify as ENERGY STAR as long as they incorporate Display Power Management Signaling (DPMS), a standard from the Video Electronics Standards Association (VESA) for managing the supply of power to a video monitor through a computer graphics card.

CEA member companies are not intimately familiar with the VESA DPMS standard referenced, and are currently studying this issue. As this is a new requirement in Draft 2, it is likely too late for manufacturers to implement this feature to meet the Version 4.0 effective date of May 1, 2010. Accordingly, we request that this requirement be deferred for possible inclusion in Version 5.0.

The ENERGY STAR program for televisions has been, and remains, a huge success. We welcome the opportunity to work closely with the EPA to establish a new tier specification and look forward to its successful implementation in the marketplace. As always, please do not hesitate to contact us if you have any questions or requests.

Sincerely,

_____/s/
Bill Belt
Senior Director, Technology & Standards

cc: Bijit Kundu, ICF International