

Draft 2 Versions 4.0 and 5.0 ENERGY STAR® TV Specification Comment Response Summary Document																	
July 20, 2009																	
This document is intended to summarize comments submitted by stakeholders in response to the Draft 2 Versions 4.0 and 5.0 (formerly called Version 3.1 Tiers 2 and 3) ENERGY STAR TV specification and includes an EPA response to each comment. Please note: this summary includes only those comments that EPA received permission to make public.																	
Topic	Comment	EPA Response															
ON Mode: Version 4.0	Several stakeholders noted that the proposed specification does not effectively differentiate most effectively among smaller screen sizes.	Based on stakeholder discussion at the June 24 stakeholder meeting, EPA has re-examined the ON Mode requirement for small screen sizes (less than 25 inches). Based on stakeholder recommendations, EPA proposes in the Final Draft specification to modify the Version 4.0 ON Mode requirement for TV with a screen area of less than 275 inches squared to the following requirement: $P_{max} = 0.19 \cdot A + 5$, where P_{max} is the maximum ON Mode power (in watts) and A is the viewable screen area (in inches squared). Under this new proposed requirement, one-third fewer televisions in the 20-inch size bin currently meet the ON Mode requirement, from 61% of all models in the 20-inch size bin to 40%.															
	Several stakeholders suggested 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 proposed limit while approximately 19% of the TVs over 23 inches qualify.	<p>Below are the differences in ON Mode power level requirements in watts for example screen sizes for Version 4.0 and stakeholders' proposals.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th>42"</th> <th>50"</th> <th>60"</th> </tr> </thead> <tbody> <tr> <td>Version 4.0</td> <td>115</td> <td>153</td> <td>210</td> </tr> <tr> <td>Stakeholders' Proposal</td> <td>133</td> <td>187</td> <td>266</td> </tr> <tr> <td>Difference</td> <td>18 watts</td> <td>34 watts</td> <td>56 watts</td> </tr> </tbody> </table> <p>EPA has not accepted this proposal because market trends suggest qualification rates would be unacceptably high when the specification goes into effect and because rough estimates indicate that the counterproposal would result in significant lost financial and environmental savings. For illustrative purposes, assuming CEA's sales projection of close to 20 million 40-inch and larger units in 2010 with roughly 5 million units meeting the proposed ENERGY STAR requirement, the counterproposal would result in 250 to 780 million pounds of lost annual CO2 emissions compared to the EPA proposal as well as \$19 to \$58 million in lost annual consumer savings.</p> <p>Due to this lost of savings associated with larger screen sizes EPA is not planning to adopt this proposal.</p>		42"	50"	60"	Version 4.0	115	153	210	Stakeholders' Proposal	133	187	266	Difference	18 watts	34 watts
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	<p>One stakeholder noted their concern with the ON Mode requirement as it applied to 42 inch and larger models that are the most popular screens with consumers. They noted that EPA must recognize the buying habits of the consumer, who typically shop and buy screen sizes to meet their room size needs first. Therefore, consumers should have the opportunity, by screen category, to find a reasonable number of ENERGY STAR products in a ‘best in class’ program.</p> <p>Another stakeholder noted that the qualifying models are largely smaller or large models of one technology type--rear projection DLP TVs, which industry analysts’ forecast will disappear from the marketplace by 2011.</p>	<p>EPA’s goal is that when Version 4.0 goes into effect that approximately 25% of available models will meet the ENERGY STAR requirements with reasonable selection across screen sizes. Based on EPA's current dataset, there are feature-rich, mid- and large-screen models from several different manufacturers available today that are able to meet the proposed ON Mode requirements in a variety of price points and sizes, utilizing conventional backlight technology (i.e., CCFL) and some models utilizing emerging, more efficient backlight technologies (e.g., HCFL, LED). In addition, based on input directly from several TV manufacturers and their Web sites, EPA also understands that several manufacturers have recently released new lines of LED-backlit TVs that are available in mid- and large screen sizes at a variety of price points (e.g., Sharp, Vizio, among others). In addition, there are even more models that are within 5 to 15% of the proposed requirement for each size category. EPA expects that manufacturers will make relatively small modifications to these units in order to meet the Version 4.0 requirements by the effective date of May 2010. For instance, for 32-inch models, 12% of all 32-inch sets in the dataset available today meet the proposed Version 4.0 requirements. An additional 14% of all 32-inch sets in the dataset are <u>within 5%</u> of the ON Mode requirement. EPA expects developments can be made to improve the efficiencies of these sets by the effective date of May 2010.</p> <p>This reinforces the information EPA has been receiving from roadmaps for top panel manufacturers and top tier TV manufacturers and the 2009 Society for Information Display International Symposium, Seminar and Exhibition. Based on information collected, EPA expects many more mid- and large-sized energy efficient models, utilizing different backlight technologies, will be available by May 2010 and into May 2012, the proposed Version 5.0 effective date. Roadmaps for the top four panel makers show LED backlight TVs in all 32-inch and larger series going forward.</p> <p>Additionally, for three of the most popular screen sizes, 32-, 40-, and 46-inch models, the range of Manufacturer Suggested Retail Prices (MSRPs) for the top 15 best-selling models for each size category aligned closely with the range of listed MSRPs of televisions in those same size categories that currently meet the Version 4.0 requirements.</p> <table border="1" data-bbox="926 902 1782 1127"> <thead> <tr> <th></th> <th>32"</th> <th>40"</th> <th>46"</th> </tr> </thead> <tbody> <tr> <td>ENERGY STAR V4.0 Models: Range of MSRPs</td> <td>\$400 - \$1100</td> <td>\$1100 - \$1900</td> <td>\$1400 - \$3000</td> </tr> <tr> <td>Non V4.0 Models: Range of Listed Price for Top 15 Selling Models from Major Retailer</td> <td>\$380 - \$1100</td> <td>\$750 - \$1800</td> <td>\$1298 - \$3200</td> </tr> </tbody> </table>		32"	40"	46"	ENERGY STAR V4.0 Models: Range of MSRPs	\$400 - \$1100	\$1100 - \$1900	\$1400 - \$3000	Non V4.0 Models: Range of Listed Price for Top 15 Selling Models from Major Retailer	\$380 - \$1100	\$750 - \$1800	\$1298 - \$3200
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	<p>One stakeholder questioned EPA’s use of information from industry analysts or utilities, stating a preference for EPA seeking data from major TV manufacturers. The stakeholder noted that the EPA should consult, share and verify with each manufacturer the data and reports that were referenced and used in the EPA decision to establish energy specifications.</p>	<p>EPA has used a number of information sources including: data from manufacturers, conversations directly with television manufacturers, manufacturer Web sites, conversations with component manufacturers, industry reports from well-known research companies that were endorsed by stakeholders during the last specification revision process, and tradeshow information in developing the proposed specifications. EPA believes that the combination of these different sources is necessary in setting levels that ensure ENERGY STAR is associated with leadership products in 2010. As part of the specification process, EPA has been forthcoming with stakeholders on all the information that has been used to inform EPA’s decisions.</p>												

<p>ON Mode: Version 5.0</p>	<p>One stakeholder noted that it is premature to set an On Mode limit effective 2012 with a dynamic product category like TVs. The stakeholder suggested 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.</p> <p>Some stakeholders noted that there is significant doubt among nearly all TV manufacturers about whether they will be able to produce any models that can meet the aggressive Version 5.0 limits</p>	<p>EPA based its Version 5.0 proposed requirements on the rapid improvements in efficiency realized between Version 3.0 development and the present, expected additional efficiency projected for 2010 models, and trends toward efficiency projected by manufacturers and market research firms to continue into the Version 5.0 timeframe. Supporting such trends is significant consumer interest in energy efficient TVs and consumers’ willingness in many cases to pay more for such products. Further, in this time of incredible interest in efficiency and stamping out greenwashing, the ENERGY STAR program is investing more than ever in the integrity and relevance of the brand. By setting a future tier (May 2012), EPA is providing advance notice, ensuring that ENERGY STAR specifications are revised in a timely manner and that the ENERGY STAR is a mark of superior performance despite the rapid evolution of this product category. EPA is committed to revisiting requirements before they go into effect and will revise the requirements as needed.</p> <p>In addition, at the 2009 Society for Information Display International Symposium, Seminar and Exhibition, television manufacturers were displaying numerous different television models, between 32- and 55-inches, with power consumption values that would easily meet the proposed Version 5.0 ON Mode requirements, even with uncertainty accounted for due to power measurements not following IEC test procedure. Although these units are prototypes now, these prototypes suggest significant manufacturer effort to lower power use and increase television efficiency, all while maintaining or improving performance. In the next three years, it seems likely the technology shown could be found in mainstream consumer televisions. EPA will continue to monitor the marketplace over the coming years to verify these efficiency trends.</p> <p>EPA is committed to revisiting with stakeholders the requirements before they go into effect and will revise the requirements as needed.</p>
	<p>A stakeholder noted that EPA proposed overly aggressive energy use limits for a Version 5.0, and asserted that EPA is focusing in this specification on consumption rather than efficiency.</p>	<p>Consumers rely on the ENERGY STAR program to direct them to products that will help them save money and fight global warming. As TVs continue to grow in size and environmental impact, EPA recognizes that there is a limit to what ENERGY STAR can credibly classify as a TV that delivers both consumer savings and benefit for the climate. Rather than exclude the especially large TVs from the ENERGY STAR program, EPA proposed and plans to finalize an approach whereby TVs greater than 50 inches can earn the ENERGY STAR label as long as their consumption does not exceed that specified for the 50 inch models. Trends in TV sales and technology evolution suggest that even with a consumption limit imposed for especially large sizes, consumer choice across a wide spectrum of sizes, including large sizes, will be accommodated.</p>
	<p>Another stakeholder questioned whether EPA is seeking stakeholder input on the Agency’s proposed Version 5.0 and encouraged EPA to stay true to its commitment to implement an “open stakeholder process to determine the appropriateness of its requirements.”</p>	<p>EPA proposed the Version 5.0 requirement in the Draft 2 stage of the specification revision process. EPA has engaged in open dialogue with stakeholders throughout this specification revisions process and will continue to maintain an open stakeholder process through Web-based meetings, conference calls, and in-person meetings. EPA is committed to revisiting requirements before they go into effect and will revise the requirements as needed, seeking stakeholder feedback as it does so.</p>

<p>DAM</p>	<p>Some stakeholders commented that the proposed DAM limitation is insufficient to meet the needs of the services currently offered, and anticipated for future offering, by the DAM feature. The commentors proposed that total DAM power consumption limits be no lower than 80 watt-hours in a 24 hour period.</p> <p>Another commentor noted that that most CE OEMs do not currently measure DAM power utilization, and there is a very real risk that current semiconductor designs or printed circuit board designs may not technically allow such low DAM power utilization.</p>	<p>Based on conversations EPA has had with TV manufacturers and content providers, EPA understands that based on current transmission options and certain variability concerning download acquisition mode (DAM), the 0.02 kWh/day requirement may be difficult for televisions to meet by May 2010. Therefore, EPA is proposing a DAM requirement for TVs of 0.08 kWh/day for the Final Draft of Version 4.0. This level was based on an expected power of 20 watts while in DAM for a duration of 4 hours, which EPA understands from service providers is the longest amount of time needed for a television to download information in a given day, also considering regional content differences. Manufacturers do not have to meet these power and duration levels, only the overall proposed 0.08 kWh/day requirement. This would give manufacturers a level that EPA understands is technologically feasible, while realizing energy savings. Furthermore, EPA understands that DAM technology is rapidly improving and will use less energy in the coming years. EPA expects as Ethernet connected televisions become more prevalent in the market, that a separate DAM while in Sleep mode may no longer be necessary. EPA will be tracking this information closely to inform a DAM requirement for Version 5.0. In the Final Draft, EPA is proposing a DAM requirement of 0.02 kWh/day for Version 5.0.</p>
	<p>Concerning testing, one commentor noted the following:</p> <ul style="list-style-type: none"> *DAM power utilization can vary based on initial startup conditions, which may last for a day or more as the device searches and downloads initial data, vs. steady-state operations which will dominate the energy usage of the device over time. *DAM power utilization will vary with the size of the data transmitted, which will necessarily fluctuate on different days and in different geographies. *DAM power utilization will vary with errors in communication, which will require more transmission time and power consumption. *Total DAM power utilization may take place over long periods of time, potentially consisting of several short periods of DAM mode over a 24-hour day. 	<p>In order to test DAM, EPA proposes the following method based on several discussions held with stakeholders. Stakeholders are encouraged to provide feedback on this test procedure to measure DAM. EPA would like to work with interested stakeholders in the coming weeks to ensure the test procedure to measure DAM is appropriate.</p> <ol style="list-style-type: none"> 1) Connect the television to an active RF terminal and set the television to Sleep Mode. 2) Using an approved power meter, collect the power consumed over a 24 hour period. Determine the total energy consumed in watt-hours. 3) Multiply the Sleep Mode power consumption (in watts) of the television, measured according to IEC 62087, by the difference of 24 hours subtracted by the amount of time (in hours) indicated by the service provider that the products is in DAM per 24-hour period. For example, if the service provider indicated that the television would be in DAM for 3 hours per day, you would multiply the Sleep mode power consumption by 21 hours, or 24 minus 3. 4) Subtract the value calculated in Step 3, in watt-hours, from the total watt-hours measured in Step 2. This value must be less than 80 watt-hours.
	<p>One commentor generally supports the notion of allowing users to disable unused or duplicative On-Screen Guide functionality that would otherwise unnecessarily consume power via DAM mode. While they would not support a prescriptive model of user interface design, they generally agree that turning off On-Screen Guide functionality should be displayed next to other settings information.</p>	<p>Based on feedback from stakeholders, EPA is proposing in the Final Draft that channel programming guide functionality is disabled on televisions upon shipping. In addition, upon activation of this feature by the user, EPA will propose an additional prompt to confirm a user's choice, noting that enabling this feature may increase the power consumption of their television.</p>
	<p>In the case that a television is shipped with On-Screen Guide functionality disabled, a commentor stated that the device should be tested and qualified for ENERGY STAR in this state, regardless of DAM mode power utilization if the On-Screen Guide is enabled.</p>	<p>EPA agrees with this comment. The Sleep and ON Modes of a television should be tested at factory default settings and according to the relevant IEC test procedures noted in the Test Methodology section of the specification. To EPA's knowledge, there is no provision in these test procedures that considers channel programming guide functionality.</p>

	<p>As the Internet becomes the preferred method for acquiring television data, one stakeholder noted that the power consumption in DAM mode may be significantly reduced. At this time, the stakeholder recommended that ENERGY STAR provide incentives for such a transition and the associated power savings, but steer clear of prescriptive or normative standards for this emerging market until the relevant factors in power consumption become more clear.</p>	<p>As noted in the Draft 2 specification, EPA understands that network connectivity for TVs will be a more common feature in future models. The power implications of this feature are not well understood. In order to treat all products equally and not penalize products with greater capability, EPA is proposing to require units with network capability be disconnected from the network during testing.</p> <p>To gain a better understanding of the power and functional implications of network connectivity, EPA would encourage stakeholders to submit ON and Sleep Mode power measurements of products with network capability with and without an active network connection.</p>
<p>DAM for Hospitality Sets</p>	<p>One commentor believes that the key differentiator for a hotel TV is the inclusion of a connector supporting protocols compatible with hotel head-end systems.</p>	<p>EPA agrees with clearly differentiating televisions destined for hospitality settings. Based on stakeholders input, EPA is proposing differentiating hospitality televisions by presence of an RJ-45 port AND installed SmartPort software.</p>
	<p>Televisions with this feature should be allowed to consume some amount of power 24/7 to maintain communication with the hotel server.</p>	<p>EPA proposes the following Typical Electricity Consumption (TEC) approach for hospitality TVs, giving manufacturers greater flexibility in meeting the ENERGY STAR kWh requirements. EPA has employed this approach with other product categories such as imaging equipment, computers, and set-top boxes.</p> $TEC = (P_{On Mode} [in watts] * 5 \text{ hours}) + (P_{Sleep} [in watts] * 19 \text{ hours}) + (E_{DAM} [in watt-hours])$ <p>must be less than the TEC limits as determined by either Equation A or B</p> <p><u>A. For models where A < 275 sq in:</u> $(([0.19 * A] + 5) * 5 \text{ hours}) + (1 \text{ watt} * 19 \text{ hours}) + (80 \text{ watt-hours})$</p> <p><u>B. For models where A ≥ 275 sq in:</u> $(([0.12 * A] + 25) * 5 \text{ hours}) + (1 \text{ watt} * 19 \text{ hours}) + (80 \text{ watt-hours})$</p> <p>Where:</p> <ul style="list-style-type: none"> - P_On Mode is the average ON Mode power consumption in watts and rounded to the nearest whole number. - P_Sleep is the average Sleep Mode power consumption in watts and rounded to the nearest whole number. - E_DAM is the energy in DAM in watt-hours per 24 hour period. - A is the viewable screen area of the product in square inches.

<p>Luminance</p>	<p>Some stakeholders noted that it is unnecessary or premature to include luminance levels in the ENERGY STAR requirements in the absence of complaints to TV manufacturers and TV retailers and there does not appear to be a problem with default brightness levels of televisions.</p> <p>Another commentor suggested that EPA revisit this feature when finalizing the Version 5.0 Specification, allowing 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. Thus, any proposal to impose limits on luminance and/or tie luminance levels to power levels is, at best, premature.</p>	<p>Even absent such data at this time, EPA believes that concern raised by numerous television manufacturers and other stakeholders independently, global action on this issue, and the increased risk of dimming as the ENERGY STAR requirements increase in stringency, all call for warrant initial action as proposed in Version 4.0 as well as close attention and possibly study going forward. EPA will continue to study this issue and, if needed, may choose a different path to address luminance settings under Version 5 based on data and information collected.</p> <p>Based on stakeholder discussions and input, EPA is maintaining the Draft 2 proposed luminance requirement to maintain harmonization with requirements outlined in the European Union: “To qualify as ENERGY STAR under this specification, the peak luminance of the product in the ‘home’ mode, or in the default mode as shipped, shall not be less than 65% of the peak luminance of the ‘retail’ mode, or the brightest selectable preset mode, of the product.” EPA anticipates collecting and posting luminance and power levels for both retail and home modes for ENERGY STAR qualification. EPA will review this data closely and adjust this approach prior to the effective date for Version 5.0, as needed.</p>
	<p>Several stakeholders noted the luminance requirements should not burden retailers with passwords or other restrictions or take other steps that could result in ENERGY STAR TVs being displayed at retail in uncompetitive modes and that there would be many problems in implementing this approach uniformly and effectively across thousands of retail locations. The current required confirmation of retail mode is an adequate precaution.</p>	<p>The Final Draft ENERGY STAR specification proposed approach does not incorporate this concept of a password-protected retail mode.</p>
	<p>One stakeholder noted the requirements should not make it difficult for consumers to adjust their TVs to their particular lighting conditions. While Automatic Brightness Control is preferred, manufacturers cannot accommodate the viewing needs of all consumers with a single ambient-light-to-brightness curve.</p>	<p>The Final Draft ENERGY STAR specification proposed approach provides manufacturers some flexibility when setting luminance specifications for home and retail modes (i.e., does not closely couple the modes). In addition, the proposal does not prevent or make it more difficult for users to adjust the brightness settings of their particular set to their lighting conditions. The proposed luminance requirement only applies to the home and retail preset modes. In addition, the current proposal outlines the approach for testing products with the Automatic Brightness Control feature.</p>
	<p>One commentor urged EPA to propose that EPA follow the lead of the European and Australian governments. Both opted in favor of TV regulations that do not effectively limit the “home” mode energy savings. The European and Australian approach to these regulations suggest a recognition that if the potential problem is a lack of luminance in “home” mode, then that is the characteristic, i.e. luminance, that should be addressed with a minimum level, not power. This approach allows the manufacturer greater flexibility to supply TVs with sufficient brightness while still saving as much energy as is possible in the “home” mode for any given technology.</p>	<p>The Final Draft specification will incorporate this concept.</p>

	<p>Another commentor expressed concern regarding an NRDC proposed approach concerning luminance noting that there must be much greater than a 15% differential between the brightest user selectable mode power and that of the “home” mode. Although the “home” mode is adequate for the majority of consumer environments, there needs to be a greater allowable range of settings to accommodate very bright ambient locations such as rooms with many windows allowing direct sunlight viewing conditions.</p>	<p>The EPA Final Draft specification proposed approach does not incorporate this concept. The proposed approach provides manufacturers some flexibility when setting luminance specifications for home and retails modes (i.e., does not closely couple the modes).</p>
<p>Luminance Testing</p>	<p>One commentor noted EPA’s proposed test procedure states that all luminance measurements must be performed in dark room conditions. The commentor noted that 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, the commentor 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.</p>	<p>EPA agrees with this and proposes the following test procedure and conditions in the Final Draft specification. Stakeholders are encouraged to provide feedback on this test procedure. Additionally, EPA would like to work with interested stakeholders in the coming weeks to ensure the test procedure to measure luminance is both appropriate, consistent, and provides clear and specific guidance.</p> <ul style="list-style-type: none"> • Measurements shall be made using a reliable, accurate and reproducible measurement procedure, which takes into account the generally recognized state of the art measurement methods. • Measurements of peak luminance shall be made with a Light Measuring Device (LMD), detecting that portion of the screen exhibiting a test pattern (VESA FPD Standard 2.0, A112-2H, L30) that provides a full white (0.7 volts) box that occupies 30% of the image. • Measurements of luminance ratio shall be made without disturbing the luminance meter's detection point on the display whilst switching between the home-mode condition or the on-mode condition of the television as set by the supplier, as applicable, and the brightest on-mode condition. <p>Conditions</p> <ul style="list-style-type: none"> • Dark Room Conditions: All luminance testing shall be performed in dark room conditions. Measurements should be taken perpendicular to the center of the display screen using a Light Measuring Device (LMD). • Measurements shall be made with the Automatic Brightness Control function, if such a function exists, made inactive. If the Automatic Brightness Control function exists and cannot be made inactive, then the measurements shall be performed with the light entering directly into the ambient light sensor at a level of 300 lux, or more.
	<p>Another commentor noted that the most appropriate pattern is the 3-bar white and black pattern, which is specified in the Australian approach to this issue. It is well defined and readily available since it is already supplied on the IEC 62087 DVD or Bluray discs which also contain the 10-minute test loop. As an alternative, the commentor recommended the European approach of using a full-white pattern which does not exceed the point where any power limiting occurs in the TV being measured.</p>	<p>The Final Draft specification incorporates the a test pattern (VESA FPD Standard 2.0, A112-2H, L30) that provides a full white (0.7 volts) box that occupies 30% of the image. EPA anticipates observing closely the submitted data regarding luminance and will revise the test procedure or approach for Version 5.0, as needed. Further, EPA is proposing to post reported luminance data along with other qualified product data.</p>

<p>DPMS</p>	<p>A couple stakeholders noted that DPMS 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. They noted that the vast majority of televisions – and television chipsets – do not currently include DPMS support. Therefore, it was recommended that a DPMS requirement be deferred for possible inclusion in Version 5.0.</p> <p>One stakeholder noted that DPMS is a power saving method more appropriate for personal computer monitors and not for consumer TVs.</p>	<p>EPA will remove the DPMS requirement for televisions in the Final Draft specification for Version 4.0. EPA fully intends to require implementation of Display Power Management for VGA and DVI connectors for Version 5.0.</p>
<p>Test Procedure</p>	<p>Some commentors asked EPA to reference a new draft CEA standard, CEA-2037 Determination of Television Average Power Consumption, once it becomes final. The commentors asked EPA to replace some of the measurement language in the ENERGY STAR specifications and simply reference CEA-2037.</p>	<p>EPA is considering this proposal and is seeking stakeholder input.</p>