



May 31, 2012

Ms. Verena Radulovic  
United States Environmental Protection Agency  
Office of Air and Radiation  
120 Pennsylvania Av NW  
Washington, DC 20460

**Subject: Comments Regarding the ENERGY STAR Proposal for Addressing ABC**

Dear Ms. Radulovic,

On behalf of the Northwest Energy Efficiency Alliance (NEEA), Pacific Gas and Electric Company (PG&E), and Sacramento Municipal Utility District (SMUD), we respectfully submit comments in regards to the Proposal for Addressing Automatic Brightness Control (ABC) in Version 6.0 ENERGY STAR Television (TV) Specification issued May 16, 2012.

As sponsors of utility incentive programs for TVs, we work with retailers and manufacturers to help consumers become more informed about the benefits of purchasing energy-efficient TVs. The BCE Program provides financial incentives and marketing support to encourage manufacturers and retailers to educate, promote and sell the most energy-efficient TVs on the market. We currently promote products that meet and exceed existing and future ENERGY STAR specification levels.

The Business and Consumer Electronics (BCE) program managers support EPA's efforts to establish a new Version 6 specification for Televisions. We support ENERGY STAR's harmonization with DOE's efforts in developing a test procedure to measure the energy consumption of TVs so that the results are accurate, repeatable, minimize testing burden, and reflect real-life usage of TVs when possible.

We appreciate EPA's efforts in trying to balance finalizing the Version 6 specification so that manufacturers can qualify products by April 2013 while ensuring DOE-developed test procedures are properly designed and vetted by stakeholders, including issues addressing ABC testing. Please consider our comments below:

**1) We are concerned that EPA's proposal, as outlined in the May 16 document, may create confusion in the marketplace by having multiple qualification processes and create additional testing burden on manufacturers. We believe that EPA should require all Version 6 testing use the finalized DOE test procedure, and not implement a temporary qualification process.**

We believe that the Version 6 TV specification is a robust specification that establishes stringent On Mode power criteria and, through the revised DOE test procedure, incorporates an accurate method of incorporating ABC. To ensure the integrity of the Version 6 specification, we believe it is critically important that all models qualifying under the Version 6 specification are tested using the finalized DOE test procedure.

The release of the finalized DOE test procedure by mid-Fall plays a critical role in the successful implementation of the Version 6 specification in time for the 2013 TV rollout. Once the DOE test procedure is finalized and ready for testing use, manufacturers are required to test their models according to the updated TV test procedure within 180 days. Ideally, the DOE test procedure will be ready for use before manufacturers begin qualifying their 2013 models.

However, regardless of when DOE finalizes the test procedure, we believe that EPA should not develop an interim test method for Version 6, and require that all Version 6 testing use the finalized DOE test procedure.

If the DOE test procedure is finalized by mid-Fall, manufacturers should have sufficient time to test and attain product qualification before 2013 models reach the shelves in April. Under this condition, there is no need for an interim test method. An alternate test method would only create confusion, and it is unlikely that manufacturers would use the interim method since they would be required to re-test using the finalized DOE test method within 180 days of the publication of the Test Procedure Final Rule.

Implementing an interim ABC test proposal creates the potential for models to initially qualify for Version 6 under the interim test method and no longer qualify under the DOE test method. This would create confusion in the market because the same model could qualify under Version 6 then lose qualification within months. An interim test method also places additional test burden on manufacturers.

**2) We recommend EPA work with manufacturers and certification bodies to ensure there is sufficient capacity to implement required Version 6 testing in a timely manner so that products are not delayed ENERGY STAR qualification status due to bottlenecks in the certification process.**

In 2011, EPA established a third party testing requirement to ensure consumer confidence and protect the investment of ENERGY STAR manufacturing partners. There are a limited number of certification bodies, and therefore we are concerned that the recent third party testing requirement may have resulted in a decrease in available testing capacity. Developing an interim test procedure will place an additional burden on already constrained resources since products will already have to be re-tested under the new DOE test procedure. This may result in a testing backlog that delays products from receiving ENERGY STAR certification. Therefore, we recommend that EPA work with manufacturers and certification bodies to better understand how the new testing requirements will impact the testing capacity of the certification bodies.

We would like to reiterate our support to EPA for thoughtfully considering how to best incorporate the DOE TV rulemaking into the ENERGY STAR Version 6 specification, especially in regards to Automatic Brightness Control. We thank EPA for the opportunity to be involved in this process and encourage EPA to carefully consider the recommendations outlined in this letter.

Sincerely,



Stephanie Fleming  
*Senior Manager, Residential Sector  
Northwest Energy Efficiency Alliance*



Marisa Uchin  
*Senior Manager, Core Products  
Customer Energy Solutions  
Pacific Gas and Electric Company*



Jamie Cutlip  
*Program Planner  
Sacramento Municipal Utility District*