

May 21, 2010

VIA E-MAIL (Kaplan.Katharine@epamail.epa.gov)  
Ms. Katharine Kaplan  
Acting Branch Chief  
ENERGY STAR Labeling  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (6202J)  
Washington, DC 20450

**Re: Panasonic Comments on ENERGY STAR TVs DAM Testing Requirements**

Dear Ms. Kaplan:

Panasonic appreciates the opportunity to comment on the recent program requirements for ENERGY STAR TVs: Versions 4.1 and 5.1 temporary test protocol for measuring DAM energy use for hospitality televisions. We recommend adopting as a permanent test protocol, the ENERGY STAR document, "Procedure for DAM Testing: For TVs", Revision 0.2, April 30<sup>th</sup>, 2010. We believe that this document's applicability should also be expanded to measuring all TVs with DAM, rather than only hospitality TVs.

Furthermore, it would be helpful to explicitly state that either of the measurement methods: section 6.1 "Ideal" or section 6.2 "Practical" can be selected by a manufacturer to measure DAM energy use. The manufacturer should specify the section utilized in the lab report for each TV submitted.

The procedure referenced above is suitable for all types of DAM applications. Table 8.1 contains columns for reporting each DAM function's average power and measured time. This information is sufficient to determine the DAM energy utilized for each function, which is then summed to yield the total DAM energy used over a typical 24-hour period. The DAM average power can easily be verified by placing the TV into an active DAM communication state. This DAM average power generally does not vary significantly as a function of the actual data stream. Thus, the verification by a third party should not require every possible data stream associated with every DAM application or function.

Accordingly, this general test protocol is applicable to all DAM communication including hospitality TVs, EPG TVs, and others. The Rovi EPG test procedure and test feed is certainly suitable for testing those specific TVs which incorporate the proprietary Rovi software. However, the more general test protocol need not require similar data streams to be created for every possible DAM application, given the great difficulty of creating and distributing such proprietary data streams.

Referring to the temporary DAM test procedure distributed by ENERGY STAR, we would make one minor suggestion to make it even more universal. Specifically section 5.2.1 refers to some TVs that do not instantly enter Sleep mode when turned off. We discussed this during the May 10<sup>th</sup> EPA conference call on DAM testing. Section 5.2.1 states, "This will be excluded from DAM mode power measurement as long as the TV goes into Sleep mode within two minutes of being turned off by the user".

We would recommend increasing the allowable time to three minutes in order to accommodate a greater number of TVs incorporating this feature. The overall energy of such an exclusion is very insignificant. It amounts to a few minutes per day at a power which is much less than the On mode power since the display is immediately turned off when the user turns the TV off. Only some processing power is used during the two or three minute interval following the TV being turned off.

We look forward to continuing to partner with ENERGY STAR in developing a practical DAM energy test procedure which can be applied universally to TVs incorporating these advanced features enjoyed by consumers. Please contact us directly if we can be of further assistance.

Sincerely,

Mark J. Sharp  
Group Manager, Corporate Environmental Department  
Panasonic Corporation of North America

Cc: D. Cronin