

PLASMA DISPLAY COALITION

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JAMES M. PALUMBO
PRESIDENT

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Ms. Verena Radulovic
Product Labeling
ENERGY STAR Program
U. S. Environmental Protection Agency
1200 Pennsylvania Ave.
Washington, DC 20460

Re: Comments to Energy Star Draft 1 6.0 Specifications

Dear Verena:

The Plasma Display Coalition (PDC) members are among the world's most respected marketers and manufacturers of high quality and high performance plasma HDTV and LCD HDTV. The PDC and its members have consistently supported ENERGY STAR programs and objectives which have been very successful in creating energy efficient big screen plasma HDTV. In fact, 2011 plasma HDTV's are generally 60% more energy efficient than 2008 models.

We continue to believe it is in the best interest of the American consumer that the ENERGY STAR logo and brand represents an important informational message and tool representing energy efficient products without sacrificing product performance and size. Accordingly, the PDC is pleased to offer our comments regarding the on-mode wattage cap for large screen TV's and the effective date for ENERGY STAR 6.0.

ON-MODE CAP

The 6.0 specification dictates an 85 Watt cap beginning at the 50" screen size which we believe is contrary to the best interest of the ENERGY STAR program and logo and brand, and will limit choice and guidance for consumers who seek to purchase of desirable ENERGY STAR big screen products. Rather serving as a source of advice for energy-conscious consumers, the program now appears skewed toward smaller screen sizes. A review of the 'On-Mode vs. Screen Size' scatter plot included in the 6.0 proposal indicates only 20% of all the models eligible for ENERGY STAR are 50" and above. We suspect several models in this group which exceed the 6.0 cap are rear projection LCD based models as opposed to the most desired high-performance flat panel plasma HDTV or LCD.

Consumers purchase preference and desires continue to be directed toward big screen flat panel HDTV. Supporting this trend is the YTD sales performance of plasma HDTV. For the first four months in 2011, plasma HDTV is 27% ahead of for the same 2010 period. Retailers meet this demand in merchandising plans and manufacturers meet this demand in their engineering, production and marketing plans. At the same time, it is most beneficial for both manufacturers and retailers to sell larger and higher performance HDTV. For ENERGY STAR to implement a program directed toward smaller screen sizes contradicts the efforts of both retailers and manufacturers and we believe that the proposed cap limits consumer choice.

The Plasma Display Coalition is opposed to an artificial 50" and larger cap which disregards 'power proportional to screen size'. We propose eliminating the cap which begins with 50" and instead consider a 'power consumption proportional to screen size' approach that will give consumers an opportunity to purchase a "best in class" ENERGY STAR HDTV. To this end, we propose the EPA formula be applied from 200 inches and up through the 65" screen size. In implementing this plan, we believe the ENERGY STAR program will experience a balanced proportion of small and large screen HDTVs, giving consumers a wider choice among screen sizes while at the same time better aligning with both retailer and manufacturer business plans.

6.0 EFFECTIVE DATE

ENERGY STAR 5.1 will be implemented September 30, 2011. Should 6.0 be implemented in spring in 2012, 5.1 will have been in effect for a short 6-9 month period. We see no benefit (but rather confusion) in having ENERGY STAR 6.0 begin in spring 2012. Alternatively, we recommend beginning 6.0 in April 2013. This coincides with the full implementation of new 2013 models and the selloff of older 2012 models in stores. Additionally, the proposed effective date of spring 2012 does not recognize the design, testing, and labeling burdens to manufacturers created by specification transitions.

The Plasma Display Coalition and its members have a strong interest in the success of the ENERGY STAR program at retail and with consumers. We're proud that energy use by Plasma displays has been reduced significantly and we encourage deployment of a plan that recognizes energy efficiency in a class of product to give consumers guidance and choice. Capping energy at 85 Watts in 50" and above serves no real purpose for consumers.

Respectfully,

Jim Palumbo

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