

Toshiba Comments on the Draft 1 Version 6.0 Televisions Specification

We respectfully submit the following comments regarding EPA's Draft 1.0 Version 6.0 ENERGY STAR Specification for TVs.

- 1) Effective Date: an effective date in Spring 2012 is an aggressive timeline that presents challenges for Industry. We are designing products today for introduction in early 2012. It is difficult to accommodate ENERGY STAR requirements when the specification may not be finalized until Sept. 2011. We request EPA consider adopting an effective date that is at least 12 months after the final specification is published.
- 2) Sleep Mode: Clause 3.4.2 appears to require all sleep modes of a product to meet a limit, which we assume to be 1.0 W (Clause 3.4.2 appears to contain a typo. It refers to clause 2.6.2 which does not exist). We are concerned this may limit functionality of future televisions. For example, home networking is expected to be included in a larger percentage of televisions in the future. If the Sleep mode is limited to 1.0 W, features such as remotely turning on the TV using remote signals such as *Wake on LAN* will not be possible. We request EPA to consider leaving sleep mode requirements the same as v5.3 – the sleep mode limit applies only to the default Sleep mode,
- 3) Toxicity, Recyclability, and LCD Green House gas Requirements: we prefer that ENERGY STAR remain a program that promotes energy efficiency only. These requirements are outside the scope of energy efficiency. The request for partners to “.. source LCD components from suppliers who have demonstrated that they are recovering or destroying on an annual basis at least 90 percent of the fluorinated greenhouse gases (F-GHGs) used in the manufacturing...” is a difficult and complicated request for Industry. This places a significant burden on manufacturers to collect such data from all of our LCD component suppliers to confirm compliance. We request EPA remove these requirements from the proposed specification.
- 4) Additional testing: we request that EPA remove the additional testing requirements of testing on mode and standby mode with network protocols active. We understand EPA's desire for this information, but we suggest that a preferable method for obtaining this data is directly from manufacturers or our trade association. Since third party testing is required for all ENERGY STAR qualifications, this proposal would require third party labs or CBs to perform this additional testing on every model submitted at the expense of the manufacturer. For TVs with Automatic Brightness Controls (ABC), the additional testing requested could easily add 1 hour or more to the testing. At some point, this may result in increased testing fees from laboratories and/or CBs.

Instead, we suggest EPA work with manufacturers to determine what additional data is required. We commit to working with EPA to provide such data outside of the third party qualification process.

Please advise if you have questions regarding our comments.

Regards,

Jeff Howell