

# PLASMA DISPLAY COALITION

382 LAWRENCE COURT  
WYCKOFF, NEW JERSEY 07481  
201 970-2222  
[jimpalumbo@verizon.net](mailto:jimpalumbo@verizon.net)

**JAMES M. PALUMBO**  
PRESIDENT

August 10, 2009

Ms. Katharine Kaplan  
ENERGY STAR  
U. S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
MC6202J  
Washington, DC 20460

Re: COMMENTS TO ENERGY STAR FINAL VERSION 4.0/5.0 TV SPECIFICATIONS

Dear Katharine:

The Plasma Display Coalition (PDC) is replying to the ENERGY STAR TV 4.0/5.0 final specification and the stakeholder web conferences held the week July 27, 2009

For background, members of the PDC (LG Electronics, Panasonic Corporation of North America, and Pioneer Electronics) are among the world best known, most respected marketers and manufacturers of both high quality Plasma and LCD HDTV's. The PDC and its members have continuously demonstrated support of the ENERGY STAR program and objectives. We continue to believe it is in the best interest of American consumers that the ENERGY STAR logo represents an important informational message representing energy efficient products without sacrificing advanced product performance or size.

We are taking this opportunity to comment on the On-Mode requirement for Version 4.0 and 5.0.

## ON-MODE REQUIREMENT 4.0

In establishing the on-mode 4.0 proposal, the EPA asserted it was following the objective to "set power requirements without sacrificing features or performance." To this end, the EPA had proposed accepting approximately 25% of the data set, with 'models across a range of screen size categories'. The industry, and the PDC, indicated the 4.0 draft 1 did not meet the objective of the program. Specifically we concluded the:

1. Proposed specification was biased against larger screen and better performing TV;

2. EPA proposal favors 23" and smaller flat panel TV and Digital Light Processing projection TV; together these categories make up the greatest share of qualifying models counted toward the 25% program compliance target;
3. ENERGY STAR program risks losing support of the TV business community as the proposal contradicts common good business practices to offer and sell a wide range of more fully featured and larger screen size products that meet consumer demand.

During the drafting process over the past few months the PDC and other manufacturers proposed an equitable solution to balance the 25% acceptance rate across all screen sizes which would have provided consumers a reasonable choice when shopping for the most desired big screen product. We were disappointed to read the final 4.0 specification solution only lowered the acceptance rate of 23" and under product in an attempt to find a balance. Our industry's recommendation was not to simply lower the pass rate in small screens to find a balanced solution, but to raise the pass rate in larger screen TV. It appears the EPA simply ignored the most logical solution to the shortcomings of its on-mode proposal. The EPA claimed the decision to not accept the television manufacturing industry proposal was, in part, due to the fact a high percentage of TVs were qualified under the current program. It's now evident the TV industry's success in reducing power consumption is now being penalized. We are also disappointed to hear in the last conference the EPA was being pressured by public utilities to not consider the TV industry proposals and recommendations which strike a reasonable balance.

With the recent decision made by the EPA to execute the 4.0 specification in 2010, it is likely many of the most demanded HDTV's in the market place, those brands which are consistently reviewed as 'best buys' or 'most recommended' in trade and consumer publications, will most likely not carry the ENERGY STAR logo. This lack of variety in screen size is inconsistent with the goals of the program.

#### ON-MODE REQUIREMENT: Version 5.0

Establishing mid-range targets is most always a good business practice, and setting targets for ENERGY STAR in 2012 is similarly a positive step for the EPA and industry.

The EPA should recognize the fact that feature-for-feature, a 60" flat panel HDTV will require more power than a 50" model. We know of no current or future technology that will allow a 60"+ plasma, for example, to require the same power as a similarly featured 50" product. While the EPA is projecting significant energy reduction into the Version 5.0 time frame, this does not support the 108w maximum for all screen sizes above 50". We find no logical reason to cap ENERGY STAR specifications which would essentially exclude certain large screen sizes. Nor has the EPA in various meeting and conversations provided sound, supportable arguments for its proposal. Further, this EPA proposal contradicts one of its ENERGY STAR goals, 'to optimize energy efficiency across a wide range of screen sizes', and give consumers choice when making energy decisions for any television screen size.

The Plasma Display Coalition is opposed to an artificial 50" and larger wattage cap that does not recognize power proportional to screen sizes which give consumers opportunity to purchase a best in class ENERGY STAR product. We believe it is necessary to revisit the Version 5.0 proposal prior to its execution. The basis for this future discussion should begin with the following points:

1. Review of the overall 108w maximum as we believe the EPA decision to offer this proposal is based only on forward and overly optimistic comments made by various industry sources, NOT manufacturer's business and product plans;
2. Eliminating the cap of ENERGY STAR maximums for 50" and above, and instead consider a 'power consumption proportional to size' approach in all screen sizes. The Plasma Display

Coalition and the Consumer Electronics Association support a 147w maximum for 60" and larger. While aggressive, this specification provides a 'power consumption proportional to screen size' approach and is more consistent with EPA stated goals.

3. Review of EPA policy changes which effectively eliminate screen sizes from the ENERGY STAR program and carefully reconsider what appears to be undue influence from public utilities into EPA's planning and decision making.

The Plasma Display Coalition members have a strong interest in ENERGY STAR's success both at retail and in the eyes of the consumer. We are deeply concerned, however, over EPA's new policy changes as its focus on energy use rather than energy efficiency by screen size, and its insistence in eliminating screen sizes through an arbitrary policy of capping energy use. It is also troubling to note the substantial and disproportionate influence investor-owned public utilities and other activists appear to have on the EPA's policy making and decisions which are becoming unfriendly to business and consumers. We believe a policy meeting among industry and the EPA is in order and must be planned before the Version 5.0 discussion.

Respectfully,

Jim Palumbo

James M. Palumbo  
President  
Plasma Display Coalition

201 970-2222

[www.plasmadisplaycoalition.org](http://www.plasmadisplaycoalition.org)

LG ELECTRONICS  
John I. Taylor  
Vice-President, Public Affairs

PANASONIC CORPORATION OF NORTH AMERICA  
Peter Fannon  
Vice-President  
Government Affairs and Technology Policy

PIONEER ELECTRONICS  
Tracy Christall-Murphy  
Director of Marketing

