

# SONY

Sony Electronics Inc.,  
16530 Via Esprillo, San Diego, California 92127-1898 Telephone (858) 942-4700

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Ms. Verena Radulovic  
ENERGY STAR for Consumer Electronics  
U.S. Environmental Protection Agency  
Washington, DC  
[televisions@energystar.gov](mailto:televisions@energystar.gov)

Dear Ms. Radulovic:

Sony Electronics Inc., a leading manufacturer of consumer electronics and a proud partner of a number of ENERGY STAR programs appreciates the opportunity to comment on the Draft Final v6 of the ENERGY STAR Television Specifications.

## **Forced Menu Revisions**

In the Final Draft v6, section 3.2.3 was amended to include a new requirement to provide a message to consumers every time a picture setting or picture mode other than the Home picture setting is selected (section 3.2.3 iii).

There are two distinct issues with section 3.2.3 iii. **First**, this new requirement is a subset of section of 3.2.3 which defines requirements for televisions with Forced Menus. Sony televisions provide SCENE selections such as sports, cinema, game, graphics, etc., which are not available for selection during the initial start-up. Instead, these scenes can be selected at any time after the initial start-up via single button push on the remote control or via navigation through several layers of submenus. If this proposal becomes part of the final requirements, we recommend section 3.2.3 iii be separated from section 3.2.3. A new section with its own clause number designation (i.e. section 3.2.4) that includes terms other than "picture settings" to differentiate scene selections from picture settings is highly preferable. We understand other manufacturers use different terms to describe what Sony describes as a SCENE selection. For that reason, we welcome the introduction of a definition or description in the specifications that will aid stakeholders in identifying these features properly.

**Second**, the contents of section 3.2.3 iii was introduced suddenly and at the final stage of the specification revision process. Subtle as this new proposed requirement may seem, its' implementation will require manufacturers to test each scene selection within the Home and Retail picture settings available on each television so that appropriate software modification be made to be able to display the message required. It is highly important to point out that the various scene selections within the Home or Retail picture settings do not necessarily consume more energy.

Sony strongly requests more study be done on this issue as the impact will not be limited to manufacturers but also to 3<sup>rd</sup> party test labs and CBs conducting the measurement to determine product qualification. Products with multiple scene selections will require significant more time to complete testing. Needless to say, the additional time required for testing translates to increased costs to qualify products and potential delays to market. Finally, current test procedures must be revised to provide clear guidance to manufacturers and 3<sup>rd</sup> party labs to be able to conduct the tests that yield repeatable results. We respectfully ask the EPA to consider delaying introduction of this proposed requirement until a complete analysis of unintended consequences is conducted.

### **On Mode Power for Products with ABC Enabled by Default**

Sony believes the proposed provisional method for calculating on mode power should not be adopted. The provisional method offers a different approach to capture energy use. It does not provide a solution to capture real world energy use of televisions with automatic brightness controls. Until the Department of Energy finalizes its test procedure, the current ENERGY STAR method should remain in place. The provisional solution will only create confusion among consumers and disruptions with testing institutions.

In addition, adoption of this provisional method will result in manufacturers declaring on mode power use to the ENERGY STAR that will differ from the on power mode use reported to the California Energy Commission and from the declared values reported on the EnergyGuide label as required by the Federal Trade Commission.

At the moment, there is significant work in IEC and CEA work groups to model a method that best provides actual energy use on televisions with ABC. Sony is confident the input provided by manufacturers, consultants, regulators, and other interested stakeholders in these work groups are essential in the analysis and development of this test procedure. Sony strongly recommends the ENERGY STAR to wait until such analysis is complete before introducing the proposed provisional test method or any other test method for that matter that has not been evaluated by industry and interested stakeholders in great depth.

### **Standby Passive Mode Requirements**

Sony appreciates the ENERGY STAR staff for engaging in conversations our staff to clear confusion around section 3.4.3. We agree with ENERGY STAR that the contents of 3.4.3 should not be part of section 3.4. We understand the contents of 3.4.3 will be transferred to another section or will be in a new section of this specification. As an observation, while the note under section 3.4.3 clearly identifies that the EPA is not proposing performance requirements in version 6, such notes with clarifying language are typically removed from the final version. To avoid confusion, we request the ENERGY STAR to introduce language in the specific section of the final specification where this item will be identified that energy use of products with network connectivity shall be measured and submitted as part of the data collection process. The words "for qualification" at the end of 3.4.3 should be a separate instruction for test laboratories and CBs.

### **Testing**

Sony remains concerned with the fact that the EPA continues to reference to the DOE test procedure in the final draft of this product specification. We believe there could be unintended consequences in referencing a test procedure that is still in the developing stages. Sony believes conflicts could arise in the certification and verification processes in the months adjacent to the effective date of May 2013. Re-testing must be avoided at all cost to prevent disturbances in the qualification process. We ask the ENERGY STAR consider all possible options to limit impact to manufacturers and other stakeholders.

Lastly, it may be necessary to add the words "Standby-Passive Mode in section 4.1.1 to be consistent with section 4.1. We believe this is an editorial oversight.

Thank you in advance for your careful consideration of our comments. Should there be a need to discuss these comments further, please contact us at your earliest convenience.

Sincerely,



Michael DeRosa  
North America Region Product Compliance  
Service Engineering, Senior Manager