

NRDC Comments on Draft ENERGY STAR Program Requirements for TVs

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NRDC respectfully submits the enclosed comments on EPA's Draft 1 TV specification. Overall we are very supportive with the direction EPA is going and the general content of the first draft of the specification. We also want to commend the manufacturers for the speed at which they developed a consensus test method and submitted test data. Given the growth of this market, in particular with the national conversion to digital-only broadcasts in early 2009, we believe it is essential to continue to fast track completion and implementation of this specification.

Specification Approach

We are in full agreement with the EPA proposal that the specification should:

- ***Include both on mode and standby mode power levels, AND require, for informational purposes only, an estimated annual energy use projection for each TV model based on these power levels and a defined duty cycle.***
- ***Create a “technology neutral”, on mode specification for all TV types.*** - This would establish a single specification and require any TV type whether it is LCD, plasma, CRT, or some yet to be introduced technology to meet the specification's on mode power requirements. While we anticipate that some stakeholders will recommend separate specs for the differing technologies (e.g. one spec for LCDs, a different spec for plasmas, etc.), we strongly recommend against this. A single specification encourages competition both within technology classes (e.g. LCD vs. LCD), as well as between differing technologies (e.g. LCD vs. plasma). For example, in some cases the best performing plasma TVs use less on mode power than some of the less efficient LCD models with equivalent screen size.
- ***Normalize on mode power use by screen size*** – The proposed specification takes into account screen area in establishing on mode power use.
- ***Use the IEC test method for measuring on mode power use*** – NRDC advocacy on TV power use initially focused on the need to establish a single up to date test method¹ for measuring on mode power use and that it should be based on a set of representative moving test clips. As the IEC test method uses moving test clips

¹ This is essential as the current DOE test method is so outdated that it only applies to black and white TVs.

and can be applied to all TV technologies, it has been widely embraced by manufacturers and policy makers around the world.

Data Set Completeness and Transparency

The foundation of all ENERGY STAR specifications and the specification setting process is the creation and distribution of a representative data set – one that ideally includes a wide range of manufacturers, price points, sizes, and key functionality/features. While we appreciate the coordinating role CEA has played during the data collection phase, we do not understand why the manufacturer names and model numbers have not been provided to all interested stakeholders, and in particular not even to EPA. This data set does not contain any sensitive or confidential information as EPA did not ask for pricing or sales data. We respectfully request EPA to obtain model and manufacturer information and to make this more complete data set available to all interested stakeholders. Without this information, it is not possible to assess the completeness/representativeness of the data set or whether the proposed specification level is appropriate.

In addition, we think it would be beneficial to make available to all stakeholders the data set of power measurements made by other international policy makers and presented at the July 4, 2007 meeting held at the IEA in Paris.

Specification Stringency

We are supportive of the 1W standby level that has been proposed. This level is consistent with the emerging international 1W standard and the data set indicates that many models are able to meet this level.

Regarding the on mode portion of the specification, we are preliminarily comfortable with the stringency of the proposed equation, and upon receipt of a more complete data set we may have additional comments to provide.

Settings

We agree that the power measurements should be made using the out of the box/default settings. This will encourage manufacturers to ship their products with the most energy efficient settings in place, and result in the most repeatable set of test results. We believe additional strengthening of the language is needed for this part of the specification to ensure that these efficiency settings survive the initial user set up process. This is critical as several manufacturers have reported that most consumers do not change their settings after the initial set up.

As a strawman, we recommend draft language along the lines :

“To ensure that ENERGY STAR TVs remain in their energy-efficient factory settings, we require that user-enabled features that could alter the ENERGY

STAR compliance of the TV (e.g. brighter screen settings, Quick Start) shall not be accessible through initial setup menus/opt-in menus.”

Clarification on Screen Size

To ensure consistent reporting, we recommend adding to the definition section the term “viewable screen area” and requiring submission of viewable screen dimensions. Many years ago some TV and monitor manufacturers reported the overall screen size, including the part covered by the enclosure, rather than just the viewable portion. Section 3.A.1 of the spec should therefore specify the word viewable in front of the terms screen area, display width and display height.