

Extron

August 27, 2024

Ann Bailey
Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC, 20004

Dear Ms. Bailey,

I'm writing to express our strong opposition to the proposed plan to sunset the ENERGY STAR® program for audio/video (AV) products as outlined in your bulletin email dated July 23, 2024. We strongly believe that maintaining this program is crucial for advancing energy-efficient technologies and the global effort to combat climate change.

Extron has been a partner of the EPA for over a decade and has always worked closely with your organization in different areas, particularly specification development. Our design team has spent considerable time designing and developing products that are among the best in the industry in terms of efficiency, power consumption, and standby power. We were the first manufacturer in the pro AV industry to offer a complete line of ENERGY STAR® qualified power amplifiers. We have obtained ENERGY STAR certification for more than 30 products since then.

It is important to note that audio amplifiers, despite being used for a relatively small portion of time, are still among the highest consumers of energy in audiovisual systems. The ENERGY STAR program plays a crucial role in mitigating this by enforcing standards that require amplifiers to enter a very low power state when not actively amplifying sound. Without ENERGY STAR compliance, amplifiers would remain in their idle state, consuming significantly more power, even when not in use. This makes amplifiers a prime target for global energy conservation efforts, as optimizing their power consumption during idle periods can lead to substantial energy savings.

We found it surprising to learn that “a lack of performance information” is key to your decision to sunset this program. Many customers, particularly those dealing with other environmental regulations, such as LEED, depend on ENERGY STAR certification for individual components within their buildings. Sunsetting this program would impact such customers significantly. I've enclosed copies of six letters to your organization from major industry consulting firms with whom we work.

Extron USA - Worldwide Headquarters
1025 E. Ball Road | Anaheim, California 92805
800.633.9876 | 714.491.1500 | www.extron.com

Extron

Many of our end users, including major universities, colleges, and large corporations, have expressed their concerns to Extron regarding this news. Energy efficiency and sustainability are critical considerations when specifying installations and selecting equipment. These factors increasingly influence product selection decisions, emphasizing the growing importance of sustainable practices within the AV industry. I've also enclosed a copy of the comments some of them sent us.

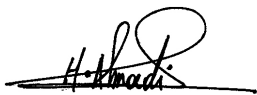
End users of commercial AV products are often leaders in sustainability, consistently ranking among the top organizations globally for their environmental performance. Removing ENERGY STAR certification from the AV industry would undermine these efforts, increase their carbon footprint, and negatively affect their green credentials.

Retaining the ENERGY STAR AV specification is essential for managing costs, reducing our environmental impact, and maintaining the United States' leadership in sustainability. Removing it would have significant negative implications, both financially and environmentally.

I have attached a copy of a recently published white paper from Sony Corporation on the importance of energy efficiency in the AV industry. This report includes valuable statistics that your team should take into consideration.

We urge the EPA to reconsider ending the ENERGY STAR specification for commercial AV products. The ENERGY STAR program has been instrumental in driving innovation and sustainability within the AV industry, providing a trusted benchmark for energy efficiency that manufacturers and end users rely on. Sunsetting this specification would not only undermine years of progress but also place a significant burden on organizations committed to reducing their environmental impact. Extron remains committed to partnering with the EPA to uphold the ENERGY STAR program's high standards and ensure that the AV industry continues to lead in sustainable practices.

Sincerely,



Homi Ahmadi
Director of Compliance Engineering

Enclosures: 8