



August 20, 2024

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

Re: EPA ENERGY STAR Audio/Video Sunset Proposal

Dear Ms. Bailey,

HARMAN International Industries, Inc. (“HARMAN”) respectfully submits the following comments on the ENERGY STAR Audio/Video Sunset Proposal, subsequent to our initial letter to the Environmental Protection Agency (“EPA”) transmitted on May 15, 2024, see appendix attached.

As a wholly owned subsidiary of Samsung, HARMAN is proud to advance environmental sustainability through effective initiatives like the ENERGY STAR Program. HARMAN fully supports the EPA’s continuation of ENERGY STAR specifications for connected audio products and the proposed Audio/Video (“AV”) program’s V4.0 Draft 1 specifications.

We cannot emphasize enough the positive impact this program has generated among our consumers and business partners across the United States and international markets. It not only positions the U.S. as a leader in sustainable product development, but also provides certainty and guidance as a flagship program for the consumer electronics industry.

HARMAN appreciates the EPA’s intent to ensure that innovative connected audio products continue to meet stringent energy efficiency standards through ENERGY STAR Program certification. To do so, HARMAN urges the EPA to continue the ENERGY STAR AV program. If the EPA moves forward with sunseting the program, HARMAN supports a grace period to allow existing certified products to continue to feature the ENERGY STAR mark in marketing materials and product labeling in accordance with the program’s certification conditions.

Thank you for the opportunity to provide HARMAN’s perspective on the proposed sunset of this critical program and we look forward to continued dialogue with the EPA.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Mooney", is written over a light blue circular stamp.

Tom Mooney
Head of Government Affairs



APPENDIX

May 15, 2024

Mr. James Kwon
EPA Product Manager
ENERGY STAR
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC, 20004

Re: EPA ENERGY STAR Audio/Video Specification

Dear Mr. Kwon,

HARMAN International Industries, Inc. ("HARMAN") respectfully submits the following comments on the ENERGY STAR Audio/Video Specification.

As a wholly owned subsidiary of Samsung, HARMAN has a long-standing commitment to environmental sustainability. We believe product design and development choices with global good in mind have far reaching and positive environmental effects. Certifying our products through the ENERGY STAR Audio/Visual program is an opportunity to demonstrate how we operationalize our values.

HARMAN fully supports the EPA's continuation of ENERGY STAR specifications for audio/video products. In 2023, HARMAN was proud to offer 24 consumer audio products featuring the ENERGY STAR rating under two legendary brands, JBL and Harman Kardon. We believe that the ENERGY STAR Audio/Video program contributes to the sustainable development of the industry for the following reasons:

- **Environmental Sustainability:** By improving power efficiency in consumer audio products, HARMAN reduces power consumption and overall product footprint.
- **Consumer Trust and Empowerment:** Featuring the ENERGY STAR brand on HARMAN products plays a critical role in informing consumers about product energy efficiency and building trust, empowering them to make sustainable and impactful choices.
- **Product Innovation:** The ENERGY STAR Audio/Visual program sets the industry benchmark and spurs continuous research and development to improve energy efficiency.

HARMAN appreciates the opportunity to provide our perspective on this critical program and welcomes continued dialogue to discuss this issue further.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Mooney", is written over a light blue circular stamp.

Tom Mooney
Head of Government Affairs