

August 27, 2024

Via e-mail: audiovideo@energystar.gov

Ms. Ann Bailey
Director
ENERGY STAR Product Labeling Branch
U.S. Environmental Protection Agency

Subject: EPA proposal to sunset the ENERGY STAR specification for Audio/Video (AV) systems

Dear Ms. Bailey:

The Consumer Technology Association (CTA) writes in response to EPA's letter dated 23 July 2024 which proposes to sunset the ENERGY STAR specification for Audio/Video (AV) systems.

For many years, CTA has supported the ENERGY STAR program with input on program direction; contributions to specification development and revision efforts; data and market research; and industry consensus standards for measuring power consumption. Additionally, CTA recently supported EPA's proposal for sunsetting the ENERGY STAR specification for small network equipment.

In brief, the ENERGY STAR specification for AV systems should not be sunset entirely, and we emphasize below the areas of continued value and demand for ENERGY STAR in the AV products and systems realm.

Soundbars

Regarding EPA's proposal to sunset the ENERGY STAR AV systems specification as it applies to consumer products, CTA urges continuation of ENERGY STAR for soundbars and speakers. While we acknowledge the evolving landscape of the broader AV market, we believe soundbars represent a vibrant and expanding product category that merits ongoing ENERGY STAR coverage.

Consumer preferences favor compact, space-efficient audio solutions, suggesting sustained demand for soundbars and speakers in the foreseeable future. The ENERGY STAR label serves as a vital signal informing consumers about energy-efficient options. This is particularly significant for soundbars, which often represent the primary audio investment for many households.

The soundbar market also is experiencing rapid technological advancements. As features such as voice assistants and wireless streaming capabilities are integrated, the landscape of energy consumption becomes more complex. The ENERGY STAR program plays a crucial role in recognizing manufacturer efforts to prioritize energy efficiency alongside these technological innovations.

Commercial products

Similarly, CTA respectfully requests that EPA continue the specification as it applies to commercial audio-video products. Comments from CTA members indicate strong interest, driven by institutional purchasers, in maintaining the ENERGY STAR AV systems specification as it applies to commercial products and professional equipment. CTA urges EPA to focus its efforts on maintaining the ENERGY STAR AV systems specification selectively in both the commercial and consumer markets and soliciting feedback from companies in these markets regarding ideas and opportunities for specification and program improvement.

Addressing smart speakers

In its sunset proposal letter, EPA notes smart speakers are included in the scope of the ENERGY STAR Smart Home Energy Management Systems (SHEMS) specification. With reference to the SHEMS specification, CTA asks EPA to ensure that future standby mode limits for smart speakers do not limit innovation and future technology developments such as additional sensors, features and networking capabilities.

Handling transitions

As EPA tailors or evolves this or any other ENERGY STAR specification, CTA asks that EPA provide guidance on how ENERGY STAR certified products in production near or after the sunset date should be handled. For example, could manufacturers continue to apply the ENERGY STAR label to products that were certified prior to a specification sunset date but which remain in production after that date?

Thank you for the opportunity to provide feedback in response to EPA's proposal concerning the ENERGY STAR AV systems specification.

Sincerely,

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