



Sent by e-mail to audiovideo@energystar.gov

August 20, 2024

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

Re: EPA ENERGY STAR Proposal to Sunset Audio/Video Specification

Dear Ms. Bailey:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the ENERGY STAR Audio/Video Specification.

Samsung is one of the leading electronics and home appliance brands in the U.S. and we are committed to providing energy efficient product options to U.S. consumers. Samsung has won the ENERGY STAR Partner of the Year Award for Sustained Excellence eleven times, including in 2024, and in 2021 we won the ENERGY STAR Corporate Commitment Award – a rare and distinguished recognition. Samsung has also won several ENERGY STAR Emerging Technology Awards, including the 2021-2022 Award for Induction Cooking Tops, 2020 Award for Advanced Adaptive Compressors, 2017 Award for Innovative Refrigerant Systems, and 2013 Award for Advanced Clothes Dryers.

EPA Should Maintain the Specification for Soundbars

Samsung strongly supports the continuation of the ENERGY STAR product specifications for audio/video products. While the rationale to sunset the AV specification for certain product categories, such as Blu-ray players, may be justified due to the declining relevance of physical media, this rationale does not hold when applied to soundbars.

The proposal suggests that soundbars have evolved to consume very low power, diminishing the need for differentiation based on energy efficiency. However, this overlooks the critical role of the ENERGY STAR program in establishing and maintaining a minimum efficiency baseline. Without this baseline, there's a risk that future soundbar designs could become less efficient, especially as manufacturers prioritize features, cost, or performance over energy efficiency. The ENERGY STAR program creates incentives to raise the bar higher on energy efficiency, ensuring that efficiency gains are maintained and improved upon. The EPA's continued involvement ensures a backstop that protects against the regression of energy efficiency standards in this and other AV product categories.

Consumers Rely on ENERGY STAR

ENERGY STAR provides a trusted and recognizable label that consumers can rely on when making purchasing decisions. The 2022 ENERGY STAR awareness survey concluded that about 90% of households recognize the blue ENERGY STAR label and 45% percent of U.S. households reported knowingly purchasing at least one ENERGY STAR-labeled product in the past 12 months prior to the survey.¹

Consumer awareness and demand for energy-efficient AV products within this scope can wane without clear labeling and guidance. If the program is phased out for soundbars, consumers may lack the necessary information to differentiate between efficient and less efficient models, potentially leading to higher energy consumption in households over time.

Samsung Proposes Alternative of Incorporating Soundbars into the Television Specification

To streamline energy efficiency efforts while maintaining oversight, the soundbar specification could be integrated with the existing ENERGY STAR specifications for TVs. Given the growing interdependence between TVs and soundbars, especially with the widespread adoption of technologies like HDMI eARC, which links their power management, their energy use is increasingly intertwined. Combining these specifications would not only simplify the certification process but also ensure that both devices meet consistent energy efficiency standards, preventing any potential gaps that could arise from separate programs. This approach would preserve the benefits of the ENERGY STAR program for soundbars while reflecting the current market dynamics where these devices are often purchased and used together.

While it may be reasonable to remove Blu-ray and physical media from the specification due to market trends, doing the same for soundbars is premature and potentially detrimental. The ENERGY STAR program serves as a crucial mechanism to ensure ongoing energy efficiency in the face of technological advancements and market shifts. Without it, consumers, EPA, and brand partners risk losing the progress made in reducing energy consumption in the AV product category and may inadvertently allow less efficient products to proliferate. Therefore, it is essential that the EPA maintains the AV specification for soundbars or as an alternative, incorporate it into the television specification as part of its broader commitment to energy efficiency and environmental sustainability.

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Samsung appreciates the opportunity to comment on EPA's proposal to sunset the AV Specification. Samsung is a proud and longstanding partner of the ENERGY STAR program and we strongly support continuation of the AV specification in one of the two options outlined above. We would gladly welcome the opportunity to discuss these matters further.

¹ https://www.energystar.gov/sites/default/files/asset/document/National_Awareness_of_ENERGY_STAR_2022.pdf

Respectfully submitted,

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