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Via E-Mail

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The Consumer Technology Association (CTA)™ appreciates the opportunity to submit comments to EPA on its Draft 2 Version 8.0 ENERGY STAR TV specification. CTA is the trade association representing the \$292 billion U.S. consumer technology industry, which supports more than 15 million U.S. jobs. More than 2,200 companies - 80 percent are small businesses and startups; others are among the world's best known brands - enjoy the benefits of CTA membership including policy advocacy, market research, technical education, industry promotion, standards development and the fostering of business and strategic relationships. CTA also owns and produces CES® - the world's gathering place for all who thrive on the business of consumer technologies. CTA represents most of the companies which design, manufacture and sell televisions.

For many years, CTA has been a supporter of energy efficiency initiatives related to the consumer technology industry, particularly televisions, at the state, federal and international levels and has supported advanced energy efficiency as part of the industry's broader commitment to environmental sustainability. CTA's and industry's involvement in the successful ENERGY STAR program is over 20 years old.

We have carefully reviewed the Draft 2 Version 8.0 specification for televisions and offer the following comments for your consideration.

Energy Saving Features And Comparable Savings

EPA is proposing to limit the use of energy saving features unless these features deliver comparable savings during typical viewing experiences. The goal is laudable, however no clear definition of "typical viewing experience" exists. In the absence of a clear definition, EPA proposes to review internal test results submitted by manufacturers prior to certification, in an effort to provide greater assurance to manufacturers seeking to certify products with new energy saving features enabled. However, this plan does not afford greater assurance to manufacturers, only greater uncertainty.

Manufacturers must perform all relevant research and development, all testing, and all final design BEFORE submitting their request to the EPA for approval. The uncertainty caused by the EPA review, and the arbitrary nature of the EPA's decision-making, eliminates all incentive to manufacturers seeking new, innovative methods to reduce energy consumption. It is simply unreasonable to believe that manufacturers would invest resources to investigate novel solutions with so much uncertainty about whether the solution will ever be deployed in a television.

It is incumbent on the EPA to do everything possible to encourage innovation in energy savings features. This proposal will have the exact opposite effect.

Finally, we note that the “typical viewing experience” is simulated using the International Electrotechnical Commission’s test loop. That test loop will be reviewed and, if necessary refined and improved, as the IEC conducts its update to their standard, IEC-62087:3.

Persistence

EPA proposes to mandate that nearly all preset picture settings include Automatic Brightness Control and any other energy savings feature enabled by default. The goal of “persistence” in energy savings features across preset picture modes is to ensure consumers are enjoying the energy savings they assume of any ENERGY STAR qualified product.

Requiring that all energy savings features, including ABC, persist across all preset picture modes puts the EPA squarely in the business of designing televisions. Only TV manufacturers have the experience, expertise, and consumer feedback required to make such decisions related to the performance of their preset picture modes. If ABC is enabled by default in all preset picture modes, these modes will likely look very similar, if not identical.

As noted above, the goal of “persistence” is to ensure consumers are receiving the energy savings they expect. As such, the persistence requirement is completely unnecessary since consumers would receive an alert anytime the activation of any Special Function disables an energy savings feature such as ABC if this provision of Draft 2 is finalized. Accordingly, as long as the consumer is fully aware of whether or not they are watching their television in the ENERGY STAR qualified mode then the goal is already met and no further requirements are needed to address this concern.

Luminance Requirements

EPA proposes that for televisions that certify to the On Mode requirements with ABC enabled by default, the luminance at 3 lux in the Default Picture Setting, with ABC enabled, shall be greater than or equal to 125 cd/m². The goal of this proposal is to ensure that TVs are not shipped with such a low luminance that a consumer will be likely to disable ABC upon initial setup.

Manufacturers believe that this new requirement necessitates further study. Some manufacturers do not believe that the luminance floor should be a fixed value, but rather a ratio between the maximum luminance in the default picture mode and the lowest luminance in any preset picture mode. Other manufacturers believe a fixed value may be achievable. Similar comments related to a luminance ratio have already been submitted by manufacturers in response to Draft 1 and we urge the EPA to study those proposals in consultation with manufactures to define a luminance floor. Further study of this issue may reveal a consensus approach with regard to a minimum luminance.

Conclusion

CTA and its members thank the EPA for the opportunity to participate in the development of this latest version of the TV specification. We remain committed to a successful ENERGY STAR program, especially as it relates to televisions. However, we encourage the EPA to use the ENERGY STAR program to foster further

innovation in energy savings features and caution the EPA to resist the temptation to micromanage the functionality of televisions. Please direct any questions to Bill Belt at bbelt@CTA.tech

cc: Ms. Verena Radulovic, EPA