

This document is intended to summarize comments submitted by stakeholders in response to the Draft 2 Version 3.0 Audio Video Specification distributed on September 9, 2011 and a subsequent memo distributed on November 8, 2011.

Please note: this summary includes only those comments that EPA received permission to make public.

Ref. No.	Topic	Comment	EPA Response
1	Networking / Control Protocols	Many products contain more modern networking features such as WiFi and Gigabit Ethernet. These advanced protocols require more power than the current Networking Adders allow.	As to not exclude advanced products from meeting the Version 3.0 requirements, EPA has amended the Networking functional allowances to more appropriately capture the power use of all prevalent networking protocols. EPA is proposing these amended allowances based on stakeholder comments, as well as industry sources both in the Audio Video product category and other product categories.
2		The specification should clarify cases in which products may receive multiple allowances for Active and In Use Networking. Two notable examples include products that have multiple different networking protocols implemented and active during test and products that contain multiple instances of a single active networking protocol.	EPA has clarified the treatment of products with multiple Networking / Control Protocols in the Final Draft by providing further allowances for multiple instances of a given In-use and Active Networking / Control Protocol.
3		As an allowance is given for Active and In Use Networking for both the Sleep Mode requirements and the On Mode requirements, a similar adder should be awarded for products in Idle Mode.	EPA understands that a networking protocol increases the required power when a product is in Idle Mode, thus an allowance for Active and In-use Networking has been added to the Idle Mode requirement.
4	Auto Power Down	Auto Power Down may be inappropriate for some commercial audio amplifiers. Professional Commercial amplifiers are often idle for long periods of time in preparation for a performance and must be ready to respond immediately once a performance begins.	In consideration of market demands for commercial amplifiers, EPA will allow commercial amplifiers to be shipped with APD disabled as long as the products meet the Idle Mode requirement noted in the Final Draft AV Specification.
5	Loss of Signal	The revised definition of Loss of Signal in Draft 2 refers to MUP thus is applicable only to amplifiers. This definition does not address Loss of Signal for a DVD player or other non-amplifier analog product. Stakeholders have suggested that definition of loss of signal should revert to a certain level above the measured noise floor.	To ensure that this definition is applicable to products without audio amplification, EPA has added an alternative definition for Loss of Signal referenced to the noise floor.

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6	Other Environmental Benefits	The Draft 2 specification points out the restricted substances in the European Union RoHS Directive as criteria in the ENERGY STAR Audio/Video specifications. While it is accurate that there are limited exemptions with specific expiration dates, manufacturers are only required to demonstrate and document the need for exemptions upon request from the relevant authorities and not as an activity required on an ongoing basis. Draft 2 seems to require manufacturers to demonstrate and document the need for exemptions.	While energy efficiency remains the basis upon which top performers are selected, EPA addresses attributes related to other aspects of product performance in ENERGY STAR specifications as applicable to ensure that overall product performance is maintained relative to a non-qualifying product. By including additional attributes, the ENERGY STAR program seeks to avoid associating the label with models of poor quality or models with features that are not compatible with broadly held consumer or societal interests, thereby preserving the influence of the label in the market. In response to stakeholder concern that placement of toxicity requirements in the product eligibility criteria could hinder international harmonization, EPA is proposing that these criteria reside instead in the ENERGY STAR Partner Commitments document, which is unique to the US market. As such, EPA has removed the Toxicity requirements from the eligibility criteria. Further, in response to feedback, EPA notes in the Partner Commitments document that it is the Agency's intention to harmonize with EU RoHS and that the toxicity requirements are not subject to third-party certification.
8		Draft 2 fails to clearly provide language to exempt the same substances exempted in the European Union RoHS Directive. To avoid confusion and to maintain consistency and harmonization with the RoHS Directive, the ENERGY STAR must consider adding language in Section 7 allowing the same exemptions as those outlined in the RoHS Directive currently in effect.	
7	Safety Requirements	There are products that may be exempt from Safety or EMC requirements that will now be burdened with additional cost for safety/EMC certification when applying for ENERGY STAR certification.	Since proposing compliance with safety requirements in Draft 2, EPA has learned through stakeholder feedback that many different safety standards may apply to A/V products and that referencing applicable local and national safety requirements does not provide enough guidance and clarity to manufacturers. Therefore, at this time, EPA is withdrawing the proposed safety requirements, with the understanding that products sold in the United States are adhering to applicable safety regulations.
9	Audio Amplification	Stakeholders have suggested specific changes to the way that Audio Amplifier Efficiency is tested and calculated. These changes are largely beneficial or applicable to only certain types of products or products with specific use cases.	Although EPA held two focused conference calls and requested supplemental comments on this issue in an attempt to identify and vet an alternate approach, an acceptable path forward for EPA and stakeholders was not identified. Thus, EPA is not proposing further changes to the Audio Amplifier test procedure in this Final Draft Specification. EPA has proposed a demarcation of amplifier types, that would allow the Agency to adapt the Test Method at a later date in a way that acknowledges the unique use cases for commercial vs. residential amplifiers.