



LG Electronics USA, Inc.

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October 31, 2016

Ms. Verena Radulovic
Product Manager
ENERGY STAR for Consumer Electronics
United States Environmental Protection Agency
Office of Air and Radiation
Washington DC, 20460

Dear Ms. Radulovic,

LG Electronics appreciates the opportunity to provide comments on concepts related to the proposed ENERGY STAR® TV V8.0 specifications.

LG strongly believes that current U.S. Department of Energy (DOE) test procedure is the right testing method under EPCA (the Energy Policy and Conservation Act, the U.S. law governing such test procedures) to test “a representative average use cycle or period of use.” So, until the DOE updates its test procedure consistent with EPCA, the EPA should keep the current V7.0 specification to be in alignment with the current DOE test procedure.

We reviewed the V.8.0 specification concepts, and it is expected that revising to the ENERGY STAR V8.0 will mean that most current ENERGY STAR-certified models would no longer qualify. Therefore, LG respectfully requests that the EPA reconsider the revision of the current V7.0

1. Specification Concept: Improving Persistence of Energy Saving Features

a) (Power measured by DOE test) * (X) + (Power in max picture setting) * (1-X) ≤ PON MAX + PHR
- X is a persistence score based on a weighted average of persistence features.

All of the evidence in the record suggests that most people do not change the defaults. We believe that it is appropriate to consider current power measured by the DOE test is the power that is actually consumed during “a representative average use cycle” by most viewers most of the time.

Even though power in maximum picture settings should be taken into consideration when measuring the average power consumption, it is reasonable to lower the weight of it under the normal use conditions, and X value should be higher than 0.8 because of the power in the max picture setting; it should be the HDR Modes as power consumption will be the highest on these picture modes.

b) Require energy saving features to be on all Settings

While most consumers don't change their picture settings, LG is leading the way in implementing Automatic Brightness Control (ABC) feature as the default mode for virtually all picture settings on our 2017 models. Among the various picture modes, a few picture settings such as the HDR Mode and Store Mode are

designed to display a brighter picture. This is an important consumer benefit, and the ABC and MEC (Motion Eye Care) energy-saving features must be turned off in these modes.

2. Specification Concept: Improving ABC Perform test with ABC disabled and require this power to be \leq power at 35 lux

We believe that consumers will benefit from energy savings with ABC turned on under various ambient lighting conditions. If ABC is disabled when the room lighting levels are above 35 lux, viewers have to watch brighter picture than is necessary, which elevates energy consumption. Indeed, 35 lux is a low luminance level considering the normal viewing condition.

We strongly maintain our position to keep the current V7.0 test condition to measure power consumption per different luminance levels, which is the most reasonable testing method to measure actual power use.

3. Specification Concept: Evaluating an UHD Adder

Manufacturers are constantly putting forth a great deal of effort to improve energy efficiency for ultra high-definition (UHD) models; however, those efforts have not yet been fruitful. We acknowledge that UHD TV models generally consume more energy than Full HD models due to the nature of the technology.

Therefore, we respectfully request that EPA apply a transitional period for manufacturers to improve energy efficiency for UHD models. In this regard, we urge the EPA to keep the current UHD Adder and if it must be changed, we hope that the change starts from FHD+ 40% with the Adder and its number gradually decreasing with a phased-in approach.

As a proud long-time ENERGY STAR partner, LG Electronics strongly supports the ENERGY STAR program, and we look forward to working with the agency on the important TV specifications going forward.

Sincerely,



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