



Verena Radulovic, Manager
ENERGY STAR for Consumer Electronics
US Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

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Ms. Radulovic,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program to the proposed updates to the Televisions 8.0 specification. After careful review of the proposal, NEEP respectfully submits the following comments.

In general, NEEP is in full support of the need for an updated specification for televisions. ENERGY STAR is a critically important federal program created with bi-partisan support that annually delivers billions of dollars of energy savings to consumers and business alike.¹ Televisions is an important product category for ENERGY STAR and with consumer trends pushing TVs to be larger and more vivid in experience, there is a risk of losing many of the base efficiency gains that have been made in the product category through the addition of features and size, potentially resulting in much more energy being used by consumers for TV viewing. Additionally, several efficiency programs offer incentives for ENERGY STAR TVs and require the specifications to evolve nearly as quickly as the technology. *As such, ENERGY STAR's leadership in setting appropriate high-efficiency voluntary specifications is once again needed to recognize those products that are able to both meet the experiential expectations of the consumer as well as save energy.*

Automatic Brightness Control (ABC)

In general, NEEP is supportive of the suggested revisions to improve the execution of ABC, including raising the minimum level to ensure customers aren't disabling ABC because the picture is too dim. With this consideration in place, fundamentally if ABC is truly an energy saving feature meriting credit by the ENERGY STAR specification, then it should be either a positive or neutral customer experience. If customers don't like it, even if it saves energy in a lab test, it may not make sense to include in the specification; if customers are displeased by the execution, they will disable the feature, and thus there will be no real-world energy savings. As such, while NEEP recognizes the justification for allowing ABC to be disabled when in Retail mode, if ABC is working well for both consumers and energy savings, then **we strongly recommend EPA tighten the recommendation to state that all "home" modes have ABC**

¹ <https://www.energystar.gov/buildings/about-us/facts-and-stats>



as the default and not allow for one or more settings to not have ABC (as detailed in lines 301-302 of the specification). If ABC is administered correctly and doesn't negatively impact the consumer experience, this should not be problematic to comply with. If ABC is not administered correctly and negatively impacts the experience, then it is very unlikely that a customer would keep the TV in an ABC-enabled mode, thus negating the savings. Additionally, by allowing manufacturers have one or more modes default to no ABC, there is nothing to keep those manufacturers from labeling those non-ABC modes as "Best Viewing" or "Optimal" or another phrasing that a consumer would be highly inclined to select. Therefore, taking away the option and ensuring that ABC is done correctly or not done at all will solve this issue.

Ultra-High Definition (UHD) Adder

The current UHD Adder of 50% was originally introduced as a means to meet UHD manufactures where they were with a new technology and not imposed too strict limitations as to alienate UHD manufactures from trying to meet the ENERGY STAR requirement. The 50% threshold was shown to be technically feasible with a few products qualifying when the V7 specification was being developed. Since then, 270 of the 716 products on the ENERGY STAR Qualified Products List are UHD,² making up nearly 40% of the list. While some of those products are taking full advantage of the 50% adder, most are hitting at significantly below that adder level. This demonstrates that products have not been scared off by the limitations set by ENERGY STAR, and with at least a dozen UHD products meeting the spec with no adder at all, the technical feasibility is there. While eliminating the adder entirely does not seem appropriate at this point in the UHD market development, in the V8 specification, it is an appropriate time to start to rein in the generous UHD adder. **NEEP recommends that in V8, the UHD allowance be adjusted down to 30%** and understands this is substantiated by the detailed analysis conducted by other efficiency organizations as referred to and provide by NEEA. At 30% a significant number of UHD products are still able to qualify, and NEEP suggests that EPA look towards the specification V9 update to again lower or potentially eliminate the UHD adder all together. This intention would be very helpful to include in Section 7 of the final specification under "Considerations for Future Revisions" such that manufacturers can start to work towards meeting those lower UHD levels in the coming years.

Finally, NEEP feels that the specification is in good shape and with the proposed changes taken under consideration, NEEP feels that EPA should be able to proceed directly from Draft 1 to Final Draft of the specification. NEEP would dissuade EPA from delaying the finalization of the specification as perfection cannot be the enemy of the good and this Draft 1 goes a long way towards improving the V7

² Based on QPL Analysis conducted 4/5/2017



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specification that was developed over a much longer time horizon. As the television market develops so quickly, the specifications must be developed in a timely fashion and NEEP feels that completing this specification according to the schedule outlined by EPA in the 3/20 webinar is both realistic and important.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comment to the Television Specification V8.0 revision. ENERGY STAR is and must continue to serve in a role of a leader in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a stylized flourish at the end.

Claire Miziolek
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