

May 22nd, 2015

Ms. Verena Radulovic
Product Manager
ENERGY STAR Program
U.S. Environmental Protection Agency
Via e-mail: displays@energystar.gov

Re: Panasonic Comments on ENERGY STAR Displays V7.0 Draft 2 Eligibility Criteria:

Panasonic appreciates the opportunity to comment on ENERGY STAR Displays V7.0 Draft 2 Eligibility Criteria. As a leading manufacturer and marketer of display technologies, Panasonic is a strong supporter of the ENERGY STAR brand and its program objectives, which have been exemplified in the current lineup of our most efficient display models ever.

Section 1) A) 1)b) Signage Display:

We support the approach of requiring signage displays to meet two or more of the listed criteria in the signage display definition. However, we recommend that the second criteria be modified such that the Maximum Reported Luminance is greater than 250 candelas per square meter rather than 400. We note that some signage displays are designed for indoor applications where the maximum luminance of the display is only about 250 cd/m² after manufacturing and white balance variations are taken into account.

Section 3.4.3: Power Allowance For Signage Displays with ABC enabled by default:

We recommend retaining the ENERGY STAR Displays V6 ABC power allowance of 10% of the maximum On Mode power requirement. This should provide a greater incentive for manufacturers to implement an Automatic Brightness Control which will save energy.

Section 3.5.2 Table 5: Full Network Connectivity Allowance for Signage Displays:

Due to the commonality of network connection integrated circuits used for signage displays and televisions, we recommend that the Full Network Connectivity allowance be equivalent to the recently published ENERGY STAR Televisions V7.0. This allows a maximum of 3.0 watts for Standby-Active, Low Mode (requires Full Network Connectivity availability test).

The Table 5 Full Network Connectivity Allowance for Signage Displays should be 2.5 watts, which when added to the Table 4 Maximum Sleep Mode Power Requirement for Signage Displays value of 0.5 watts would then result in 3.0 watts for Sleep Mode with Full Network Connectivity.

It should also be noted that the ENERGY STAR Displays Test Method V7 Draft 2 Section 6.7) B) requires the presence of Full Network Connectivity to be determined with the display connected to a network per Section 5.2) C) 1) c) prior to the test. This specifies a connection preference with Wi-Fi as the highest priority. This distinction

is important because Wi-Fi active connections generally require more power from the display circuitry than other types of connections.

Minor editorial comments:

Section 3.4.2:

“Pon_max is the Maximum On Mode Power in watts, per equation 7.”

Equation 7 should be equation 6.

Section 3.5.1:

“Measured Sleep Mode Power (Psleep) in watts shall be less than or equal the calculation of Maximum Sleep Mode Power Requirement (Pon_max).”

Pon_max should be Psleep_max.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with EPA has provided a valuable tool by which consumers can make better informed choices about their purchases of energy efficient products.

As always, Panasonic appreciates the opportunity to comment on the ENERGY STAR Displays V7.0 Draft 2 Eligibility Criteria and welcomes the opportunity to further discuss our views with you.

Sincerely,

Mark J. Sharp
Group Manager
Panasonic Corporation of North America