

September 29th, 2014

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

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

Panasonic appreciates the opportunity to comment on ENERGY STAR Televisions V7.0 Draft 2 Eligibility Criteria. As a leading manufacturer and marketer of all television 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 TV models ever.

3.2.5 Standby-Passive Mode and Standby-Active, Low Mode Settings:

We support the proposal to display on-screen information and would recommend that similar methods as in section 3.2.4 Preset Picture Setting Menu be allowed. For example, such information may be indicated by including the ENERGY STAR mark in the name or description of the default as-tested setting or in the form of a message displayed each time any setting other than the default as-tested setting is selected that the power consumption may be affected.

We support the idea of adopting similar flexible approaches to displaying on-screen information in both Sections 3.2.4 and 3.2.5.

3.3 On Mode Requirements:

We believe that the Draft 2 modification of the On-mode power requirement will be beneficial. However, given the relative maturity of the LED backlighting technology, we feel that the proposed On Mode power requirements are still too strict with only 16% of the HD televisions in the revised ENERGY STAR certified products dataset projected to qualify.

We recommend that all televisions marketed in the U.S. be considered as opposed to only those certified to meet the ENERGY STAR standards. The Department of Energy's Compliance and Certification Management System (CCMS) dataset would be more appropriate in determining the percentage of all U.S. consumer television models projected to meet the ENERGY STAR On-mode power requirement.

We would recommend using this CCMS dataset in order to determine an On-mode power requirement such that 20% of the U.S. models would qualify.

3.3.3 On Mode Power Allowance for TVs with Native Vertical Resolution Greater than or Equal to 2160 pixels:

We agree with the Draft 2 approach of an On Mode power allowance for TVs with native vertical resolution greater than or equal to 2160 pixels. We recommend that this allowance be increased to 75% of the maximum allowable On Mode Power consumption (Pon_max), and that this not expire on May 1, 2017.

3.4 Standby-Passive Mode Requirements:

We support the reduction of the Standby-Passive Mode power to 0.5 watts maximum. However, we do not believe that this limit should be decreased even further to 0.3 W as was suggested during the ENERGY STAR TVs webinar on September 16th, 2014. This change would unnecessarily prevent a large number of models from qualifying but would have a very negligible impact on energy savings.

3.5 Standby-Active, Low Mode Requirements:

We welcome the Draft 2 increase of the Standby-active, Low Mode power limit to 3 W. However, we recommend that this be implemented to harmonize with the European Union Commission Regulation (EU) No 801/2013 (Networked Standby of 6 watts in Jan 1, 2015; 3 watts in Jan 1, 2017).

3.6.2 Luminance Requirements:

We support the concept of allowing very bright TVs to ship with a Default Picture Setting above a specific threshold. However we would modify this section as follows:

“For products with a luminance in the Brightest Selectable Preset Picture Setting greater than or equal to **350** cd/m², luminance in the Default Picture Setting shall be greater than or equal to **228** cd/m².”

The beginning threshold was reduced from 450 to 350 cd/m², and the Default Picture Setting requirement was reduced from 293 to 228 cd/m². (Note that 228 is 65% of 350.)

Testing of Special Functions not enabled by Default and not included in a User Prompt:

We do not support the testing of special functions or features which are not enabled by default and not included in a user prompt.

This is consistent with the DOE Appendix H section 5.4 Special Functions which references section 11.4.6 of IEC 62087 Ed. 3.0 which states; “Special Functions not mentioned in Clause 11 shall be in the position adjusted by the manufacturer for shipment to the end user.”

6 Effective Date:

We believe that there is not sufficient lead time between the final specification (Fall 2014) and the effective date (late Summer 2015). There are several proposed changes to power levels, functionality, and user interfaces which will require more time to design and implement. We propose that the effective date be no earlier than March of 2016 which is more realistic and will encompass the introduction of the 2016 models.

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 Televisions 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