



September 5, 2018

Ann Bailey
Director, ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20035

Sent by e-mail to MostEfficient@energystar.gov

Re: Environmental Protection Agency (EPA) ENERGY STAR Most Efficient 2019 Criteria

Dear Ms. Bailey:

Samsung Electronics (“Samsung”) respectfully submits these comments on the EPA’s proposed ENERGY STAR® Most Efficient 2019 Criteria.

A world leader in technology, Samsung is the leading home appliance brand in the United States ranked by sales and has been the top manufacturer of televisions sold in the United States and globally for over ten years. Committed to providing energy efficient products to U.S. consumers, Samsung received the 2018 ENERGY STAR Partner of the Year – Sustained Excellence Award for continued leadership and superior contributions to ENERGY STAR. This is the seventh Partner of the Year award presented to Samsung and the fifth time within Sustained Excellence. Samsung also won the 2017 ENERGY STAR Emerging Technology Award for Innovative Refrigerant Systems.

Additionally, Samsung won the EPA Sustainable Materials Management 2016 Cutting Edge Champion award for quantum dot technology used in our SUHD (now known as QLED) televisions and the 2017 Cutting Edge Champion Award for our innovative Galaxy Upcycling program. EPA also honored the company’s U.S. e-waste collection efforts with the Gold Tier Award for the fourth consecutive year in 2017.

- I. **Refrigerators:** Samsung supports EPA’s plans to initiate efforts to highlight ENERGY STAR partners’ use of low global warming potential (“GWP”) refrigerants and assist with messaging to consumers about the benefit of this advancement through the Most Efficient 2019 Criteria. As a manufacturer of such innovative refrigerant systems, Samsung appreciates the recognition for using low GWP refrigerants. Through EPA’s initiative, consumers will be better able to understand this emerging technology and its environmental benefits. The EPA can play a key role in encouraging early adoption of low GWP refrigerants through recognition and incentives.
- II. **Clothes Washers:** Samsung supports EPA’s proposal to include minimum cleaning performance requirements for clothes washers in the proposed Most Efficient 2019 Criteria. Samsung believes consumers must be able to trust that the ENERGY STAR

brand signifies energy efficiency without compromising product performance. This is very important because if the products are configured to achieve higher efficiency by compromising performance—for example, by cleaning clothes less thoroughly—consumers will come to value the ENERGY STAR brand less and will turn away from energy-saving products. In particular, the mode of operation in which appliances are tested—generally, the default mode—should perform at or above a minimum level of acceptable functionality; otherwise consumers may be dissatisfied with their products in the default mode.

- III. **Televisions:** Samsung supports the proposed inclusion of a high resolution allowance to target the most efficient Ultra High-Definition (UHD) capable products. UHD televisions, as defined by the Consumer Technology Association (CTA) in its 4K Ultra High-Definition TV and Connected 4K Ultra High-Definition TV definitions, provide a significantly enhanced viewing experience for consumers with more than 8 million (at least 3840 by 2160) individually addressable pixels.¹ All else being equal, such televisions necessarily consume more energy than non-UHD models, and the high resolution allowance will enable ENERGY STAR to recognize the most efficient UHD-capable televisions.
- IV. **Future Specifications:** For the reasons outlined above, we believe that EPA should continue to consider establishing minimum acceptable functionality levels using appropriate test procedures in future specifications for ENERGY STAR qualification.

Samsung appreciates the opportunity to comment on EPA’s proposed ENERGY STAR Most Efficient 2019 Criteria. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

John Godfrey
Senior Vice President, Public Policy
1200 New Hampshire Ave., NW, # 650
Washington, DC 20036
202-997-2771
john.godfrey@samsung.com

Ravee Vaidhyanathan
Director, American Technology Office
19 Chapin Road
Pine Brook, NJ 07058
847-407-2875
ravee.v@samsung.com

¹ <https://www.cta.tech/cta/media/Membership/PDFs/Video-Technology-Consumer-Definitions.pdf>