

# SONY

Sony Electronics Inc.,  
16530 Via Esprillo, San Diego, California 92127-1898 Telephone (858) 942-4700

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September 29, 2014

Ms. Verena Radulovic  
ENERGY STAR for Consumer Electronics  
U.S. Environmental Protection Agency  
Washington, DC  
[televisions@energystar.gov](mailto:televisions@energystar.gov)

Dear Ms. Radulovic:

Sony Electronics Inc., a leading manufacturer of consumer electronics and a proud partner of a number of ENERGY STAR programs appreciates the opportunity to comment on Draft 2 v7.0 of the ENERGY STAR Television Specifications. We thank the EPA for coordinating a webinar with the stakeholders to be able to discuss specific items in depth.

## **On Mode Requirements**

Sony continues to believe that the proposed EPA on mode requirements in Draft 2 would be extremely restrictive for HD and UHD televisions.

Data shows there are four main factors that have contributed to the rapid reduction of power consumption in televisions. Undoubtedly, the biggest contribution was from changes in the shipping conditions (i.e. Retail vs. Home mode). This change alone reduced energy consumption by roughly thirty-percent. Next was the rapid introduction, from most manufacturers, of more efficient backlights (e.g. LED). Televisions with LED backlights along with proper implementation of automatic brightness controls (ABC) reduced energy consumption by nearly thirty-percent. Since the introduction of LED backlights and ABC circuits, the improvements in energy efficiency are continuing, however at a much smaller scale. Last, while not an energy savings technology, in most cases the introduction of the DOE test procedure provided better energy consumption results compared with the previous test method.

We are concerned that the EPA and other groups may have observed the drastic reductions in energy consumption from the items described above and have made assumptions that significant reductions in energy consumption will continue, and that manufacturers will achieve high qualification rates by the time version 7 becomes effective.

Since most manufacturers have adopted the technologies stated above in their current models and all manufacturers are required to use the DOE test procedure to make energy use representations in televisions, we ask the EPA to defer finalization of the specifications until a new on-mode power analysis is performed of the current models to make a comparison to the incremental improvements in next year's models. This new analysis will provide a more accurate representation of energy consumption of televisions on the market today and will help determine what might be feasible for the future.

Sony is unaware of new technologies that will offer drastic reductions in energy use. While we continue to experiment with new and improved processors, panel films and operating systems, initial data shows that reductions in energy use are relatively small. Setting unrealistic power levels in version 7 could be detrimental for manufacturers and to the ENERGY STAR program.

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## **Network Functionalities in Standby-Active, low**

Sony is delighted to see the EPA acknowledged the need for additional power in Standby-active low. The 3-watt power limit will allow manufacturers to continue to deploy features consumers will enjoy while limiting the energy use in this mode.

## **Standby-Passive, low Mode Requirements**

Sony disagrees with the idea of reducing the power limit in Standby-passive mode beyond the current 0.5 watt proposed in draft 1. Reducing the power limit to 0.3 watt provides insignificant savings to consumers and to the grid. This proposed reduction could prevent qualification of models intended for sales in regions where the operating voltage is 220V. Many televisions nowadays are designed for multiple regions with a power supply capable of operating in ranges of 120V-220V and 50/60Hz. The energy consumption in standby-passive mode for a television operating at 220V nearly doubles compared to the same television operating at 120V. Therefore, a television that consumes 0.3w at 120V will consume more than 0.5w at 220V. This new proposal, seemingly insignificant, will prevent qualification in the program in certain regions. We ask the EPA not to reduce the limit beyond the originally proposed 0.5 watt.

## **On-screen Informational Requirements**

Sony applauds the EPA for introducing subsection ii under section 3.2.5. This newly added option removes the burdens associated with modifying user interfaces for products that will no longer meet future specifications while serving the purpose of informing consumers that enabling certain features may change the energy consumption of the product.

We respectfully ask the EPA to introduce similar language into section 3.2.4 since this language serves the same purpose as in section 3.2.5.

In addition, for products that meet the specifications regardless of the selected preset picture setting, the requirement to display on-screen information should be optional. We ask the EPA to consider adding language in section 3.2.4 that reflects this condition.

## **Requirements for External Power Supplies (EPS)**

Sony is concerned that external power supplies are required to meet the DOE standards when the final version 7 takes effect (i.e. summer of 2015). The DOE standards for external power supplies are not mandated until February 10, 2016. The EPA proposed plan will shorten the time for manufacturers to comply with the DOE standards by approximately six months. For manufacturers with a large number of products, the time reduction to comply represents a huge impact. We ask the EPA to align the effective date for EPS with the DOE effective date.

## **Effective date and Direction to Certification Bodies**

The EPA released version 6.0 on September 6<sup>th</sup> 2012 with an effective date of June 1st 2013. At the same time, the EPA instructed CBs to stop certifying new products to the current version after January 15, 2013. The effective dates and instructions to CBs only provided manufacturers with four months to comply rather than nine months.

We ask the EPA to set an effective date and instructions to CBs to provide manufacturers nine months to redesign and certify products. We believe that the instruction to CBs to stop certifying products to the current version should be limited to 30 days prior to the effective date of the new version rather than six months.

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Thank you in advance for your careful consideration of our comments. Should there be a need to discuss these comments further, please contact us at your earliest convenience.

Sincerely,



David Maciel  
North America Region Product Compliance  
Service Engineering, Staff Engineer



Alan Benedict  
North America Region Product Compliance  
Service Engineering, Director