

SONY

Sony Electronics Inc.,
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December 18, 2014

Ms. Verena Radulovic
ENERGY STAR for Consumer Electronics
U.S. Environmental Protection Agency
Washington, DC
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 the Final Draft v7.0 of the ENERGY STAR Television Specifications.

We appreciate the ENERGY STAR for accommodating our requests in sections 3.2.4 and 3.2.5. These changes will remove certain burdens associated with specification changes and how they relate to the effective date for continued compliance. We also thank the ENERGY STAR for revising the on mode specification, the adder for UHD televisions, and the luminance requirements.

Our design groups continue to research and develop changes that would continue to reduce energy consumption in televisions. However, we believe the proposed effective date of September 30th, 2015 and the proposed date of May 15, 2015 to stop certifying products to the current version 6.1 may be premature.

We ask the ENERGY STAR to delay both of these dates out by at least three months. This delay will allow manufacturers to make design changes on current products; and will provide manufacturers with time to work with CBs to conduct supplemental testing to demonstrate compliance with version 7 and avoid delisting current models from the list of qualified products.

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, Vice-president