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June 30, 2014

Ms. Verena Radulovic
ENERGY STAR for Consumer Electronics

Subject: ENERGY STAR Program Requirements for Televisions, Draft 1 Version 7.0

Ms. Radulovic:

Please accept the following comments on the subject draft ENERGY STAR Specification. All comments are referenced to line numbers in the draft specification.

Line 133, Full Network Connectivity: We support the additional CEA-2037-A test required in 4.2 to confirm the product has a true Standby-Active, Low mode, but we do not think it is necessary to include requirements for "Televisions without Full Network Connectivity". If a TV in a standby mode cannot be switched into another mode "with an external signal", by definition it is not in Standby-Active, Low mode.

Line 228, Effective Vertical Resolution: if a TV meets CEA's definition of UHD, that should be sufficient. If the additional test is kept in the specification, the test and requirements should be clearly described.

Line 243, UHD definition: We urge EPA to strongly consider aligning the definition of UHD with [CEA's definition](#). CEA's definition does not include a reference to frame rate or the additional test noted.

Line 367, Informational requirements for Standby-Passive Mode and Standby-Active, Low Mode: We do not object to the additional informational requirements, but request that requirements be structured in such a way that the same OSD can be used for ENERGY STAR and non-Energy Star certified TVs. In other words, we request an option be included where the words "ENERGY STAR" are not required to appear in the OSD.

In addition, we do not support the requirement "that consumers be prompted to select a discrete time period within a 24-hour cycle" for Standby-Active, Low to be active. We request that EPA include as few requirements affecting the OSD as possible. We also note that not all TVs may have an active clock set to the correct time. If EPA decides to keep this concept, we request it be included as an incentive (maybe with an adder), but not as a requirement.

Line 388, Thin Client Capability: we request that this requirement be eliminated. It may be more appropriate to include an adder for Thin Client capability.

As products are brought to market, there are often several ongoing processes required before the TV can be sold, such as: ENERGY STAR certification, App certifications, DLNA certification, and

certifications that may be required for thin client capability. Thin client certifications may not be complete at the time the product is submitted for ENERGY STAR certification. We do not want to delay submitting products for ENERGY STAR while waiting for other certifications.

Line 402, Standby-Active, High Capability: we prefer that EPA align with DOE's test procedure and not include requirements or test methods for Standby-Active, High.

Line 430, On Mode Requirements: We believe the proposed On Mode Power Requirement may be too low.

We applaud EPA's rigorous evaluation of televisions tested to the old TV ABC test method using interpolation, but the interpolated data for our products appears lower than measured data using the new DOE test method. We do not know if this is an Industry wide phenomena.

We will be supplying additional data for our ABC TVs included in EPA's dataset. We request that the interpolated data for our televisions be deleted and replaced with our measured data.

Line 472, UHD On Mode Limits: there is limited data available for UHD models. The data EPA has referenced for UHD does not appear to be consistent with typical 4k models currently available - the data is much lower than we would expect for current UHDs - especially considering the referenced models did not include ABC.

Line 499, Standby-Passive Mode Requirements: we support the 0.5 W limit for this mode.

Line 507, Standby-Active, Low Mode Requirements: As mentioned previously, we believe "Televisions without Full Network Connectivity" do not include a mode that meets the definition of Standby-Active, Low. We request this requirement be deleted.

We also believe that the 1.0 W limit for "Televisions with Full Network Connectivity" is too low for Standby-Active, Low. We are unaware of any current televisions that can function below 1 Watt in this mode. We request EPA consider adopting a threshold level for this mode in the range of 6 - 10 Watts for the v7.0 specification. Adopting a best in class requirement of 3 Watts or less may be a restrictive barrier for ENERGY STAR certification.

Line 530, Smart TV Functionality: we caution EPA in including any requirements that may conflict with FCC Accessibility regulations that will be required in the near future.

Line 551, Luminance Requirements: Industry has always argued that the 65% luminance requirement was not necessary. Manufacturers tend to prefer a very bright setting for display on showroom floors. The 65% requirement may limit the manufacturers ability to deliver a more optimal viewing experience in Home mode at a lower power consumption. Manufacturers are less likely to decrease the brightness of the Retail mode to lower Home mode as it may affect sales.

Line 613, Additional Test for Standby-Active, Low Mode: As noted previously, we support the addition of this CEA test.

Line 660, Effective Date: We request EPA consider adopting an effective date of Sept. 1, 2015.

Thanks you for the opportunity to comment on this specification.

Sincerely,

A handwritten signature in black ink that reads "J. Howell". The signature is written in a cursive style with a large, looped initial "J" and a clear, legible "Howell".

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