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Subject: AUO comment on the ES 8.0 Final Draft specification
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Importance: High

Dear Ladies and Gentlemen,

Regarding the **ENERGY STAR Displays Final Draft Version 8.0 specification** which EPA released on March 2019, firstly we appreciate the responses from EPA on the draft 2, and we would like to present our comment on the Final version.

AU Optronics would **strongly recommend relieving the constraint of energy consumption specifically for the ultra-high resolution (UHD or above) monitor panels.**

As our evaluation based on the rule on the latest Final Draft, we found that there is about 20% off energy consumption from ES 7.0 for FHD resolution monitor panels, but there is about 25% off between ES8.0 final draft and ES7.0 for QHD & UHD! This power consumption constraint will strongly challenge all the monitor manufacturers providing ultra high resolution.

UHD (4K) resolution is a critical and outstanding technology, and the world wide market of UHD monitor is highly potential. Energy Star specification has mentioned the resolution, there is a weighting factor for the screen resolution in the E_{TEC} Max, Table 1, p.7; the weighting factors are the same as (4.00 x r), no matter FHD, UHD or others, which is not able to interpret its intrinsic importance for ultra high resolution monitor power consumption. In fact, we do consider the ultra high resolution (UHD or above) technology is a great feature and difficult process as the same as the curved, touch displays and HDR technology. However they (not high resolution monitors) have a particular allowance factor to relieve their power consumptions.

We expect EPA paying more attention specifically to ultra high resolution monitor, and suggest (i) relieving the power consumption by changing the E_{TEC} weighting factor; and (ii) increasing an allowance for monitor with ultra high resolution as the curved, touch, HDR monitors do. Practically, making the percentage of power consumption off as the FHD cases will be more reasonable.

Lessening the range of the impact on high resolution monitors will be helpful to keep growing a healthy and sustainable monitor ecosystem development.

Thank you & best regards,

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