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The Consumer Electronics Association (CEA) appreciates the opportunity to submit comments to EPA on its Draft 2 Version 7.0 ENERGY STAR TV specification. CEA is the preeminent trade association promoting growth in the \$211 billion US consumer electronics industry. CEA represents more than 2,000 companies across the consumer electronics industry, including most of the companies which design, manufacture and sell televisions.

For many years, CEA has been a supporter of energy efficiency initiatives related to the consumer electronics industry, particularly televisions, at the state, federal and international levels and has supported advanced energy efficiency as part of the industry's broader commitment to environmental sustainability. CEA's and industry's involvement in the successful ENERGY STAR program is over 20 years old.

Particularly relevant to EPA's consideration is CEA's leading role in the development of the consensus energy consumption test procedures for televisions ANSI/CEA-2037-A and the recently finalized IEC 62087-3. They are largely the basis for the DOE test procedure. We strongly believe that wherever possible well-conceived, recognized consensus standards such as these should be relied on to the maximum extent possible by government agencies around the world, including EPA and DOE. To the extent EPA unnecessarily departs from these standards international disharmony, trade barriers and additional testing burdens and confusion are the results.

In general, CEA supports the revision to the existing specification for televisions. More specifically:

**The maximum On Mode power limit is too strict, especially for larger televisions.**

CEA believes that the proposed On Mode requirements are too stringent and unjustified. They appear to particularly penalize larger televisions. The specifications should be adjusted, in particular to accommodate that product segment.

As the EPA notes, only 16% of TVs in its revised dataset meet the Draft 2 On Mode requirements. This 16% is well below the 25% of products the EPA seeks to award an ENERGY STAR rating. The 16% seems to be pegged to the progress made in the past several years by manufacturers driving down energy consumption through new innovations such as LED-backlighting and edge lighting. However, the rate of energy consumption improvements is now naturally slowing, as manufacturers work ever harder to find solutions that will drive energy consumption lower still.

Further complicating the problem, CEA believes that the ENERGY STAR revised dataset still lacks enough data about all manufactured televisions to be an accurate representation of the full market of TVs. In particular, large TVs are not well represented in the dataset. We believe that the Department of Energy's database, which includes all televisions for sale in the U.S. is much more representative of the true marketplace.

Accordingly, CEA urges the EPA to set the limits based on the DOE database and ensure that 20% of the TVs in this dataset are eligible for the ENERGY STAR designation.

**Ultra HD televisions should be eligible for a 75% adder. The adder should not have an expiration date.**

Section 3.3.3 of Draft 2 allows TVs with a native vertical resolution greater than or equal to 2160 pixels (Ultra HD TVs) to be eligible for a high resolution On Mode power allowance of 55% if certified to ENERGY STAR before May 1, 2017. After this date, no adder will be allowed for Ultra HD TVs.

Based on a current review of Federal Trade Commission's Energy Guide data and comparing similar sized TVs from the same manufacturers, it appears that Ultra HD TVs will need a larger adder. Further, the EPA proposes a seemingly random expiration date of May 1, 2017 for the adder. No technical data is provided in Draft 2 to explain the selection of this expiration date. Without a reasonable adder for Ultra HD TVs it seems likely that few, if any, will meet the ENERGY STAR program requirements after May 1, 2017.

Accordingly, CEA strongly urges a 75% adder for Ultra HD TVs with no expiration date.

**The Standby-Passive, Low Mode limit should be 0.5 W.**

During the September 16, 2014 stakeholders' meeting EPA suggested further limiting the Standby-Passive, Low Mode from the 0.5 W originally proposed in Draft 2 to 0.3 W. Reducing the limit to 0.3 W provides an insignificant savings to consumers. While the majority of TVs on the market in North America can meet the 0.3 W limit, there are still some that cannot. The amount of energy saved by reducing the Standby-Passive, Low Mode limit from 0.5 W to 0.3 W is not sufficient to justify redesigning TVs that can meet the 0.5 W limit, but cannot meet the 0.3 W limit.

Accordingly, CEA supports lowering the Standby-Passive, Low Mode to 0.5 W, but not beyond that to 0.3 W.

**The Standby-Active, Low Mode limit should be harmonized with European Union Regulation.**

Section 3.5.1 requires that Standby-Active, Low Mode must be less than or equal to 3.0 W. CEA suggests that the limit be harmonized with European Union Regulation No. 801/2013 which limits Standby-Active, Low Mode to less than or equal to 6.0 W between January 1, 2015 and January 1, 2017 and thereafter less than or equal to 3.0 W.

**The Brightest Selectable Picture Setting should be reduced from 450 cd/m<sup>2</sup> to 350 cd/m<sup>2</sup>.**

Section 3.6.2 requires that for TVs with a luminance in the Brightest Selectable Preset Picture Setting greater than or equal to 450 cd/m<sup>2</sup>, luminance in the Default Picture Setting shall be greater than or equal to 293 cd/m<sup>2</sup>. The default picture setting is set to 65% of the minimum Brightest Selectable Preset Picture Setting of 450 cd/m<sup>2</sup>. The limit is an effort to prevent TVs from shipping with a brightness setting that is too dim.

However, these existing luminance requirements limit manufacturers' ability to deliver a more optimal viewing experience for consumers at home.

Accordingly, CEA suggests that for TVs with a luminance in the Brightest Selectable Preset Picture Setting greater than or equal to 350 cd/m<sup>2</sup>, luminance in the Default Picture Setting shall be greater than or equal to 228 cd/m<sup>2</sup> (which is 65% of 350 cd/m<sup>2</sup>). We note that 228 cd/m<sup>2</sup> is brighter than the median televisions' as-shipped setting in the revised EPA dataset.

This modification will result in significant energy savings to the consumer by not requiring the TV to be shipped in a state that is too bright for optimal viewing.

**Section 3.2.4 and 3.2.5 On-screen information requirements should be harmonized**

CEA believes that it would be beneficial to harmonize the On-screen information requirements for Section 3.2.4 Preset Picture Setting Menu and Section 3.2.5 Standby-Passive Mode and Standby-Active, Low Mode Settings.

For example, such information may be indicated by including the ENERGY STAR mark in the name or description of the default as-tested setting or in the form of a message displayed each time any setting other than the default as-tested setting is selected that the energy consumption may be affected.

This flexible approach will allow manufacturers to use generic wording in the on-screen messaging. This is important since it may not be known in advance whether the product will be certified as ENERGY STAR.

**The effective date for the new specification should be no earlier than March 2016**

During the stakeholder's meeting on September 16, 2014, EPA suggested an effective date of August 2015. However, late summer represents a peak manufacturing period when manufacturers are preparing production lines for sales in retail stores tied to the Holiday shopping season.

As mentioned in past CEA comments, an effective date that aligns with production cycles is greatly desirable. March 2016 represents a period that follows the beginning of the introduction of new models, and is beyond the peak selling period associated with the Holidays and the Super Bowl.

Accordingly, CEA suggests an effective date of March 2016 for Version 7.0 of the TV specification.

As always, CEA and its members look forward to working with EPA on the development of this latest version of the TV specification. Please direct any questions to Bill Belt at [bbelt@CE.org](mailto:bbelt@CE.org)

cc: Ms. Verena Radulovic, EPA