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Via E-Mail  
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The Consumer Electronics Association (CEA) appreciates the opportunity to submit comments to EPA on its Final Draft 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.

We are pleased with the progress made during the development of this specification. Many of the main issues identified during the stakeholders' process were addressed with revisions and edits to the benefit of the final draft. While many positive modifications were made to the specification, we remain gravely concerned with the effective date for concluding certification of new product submittals pursuant to Version 6.1 and the effective date for implementation of the new Version 7.0.

The EPA currently anticipates publishing the final specification by the end of this year and the proposed effective date for the specification is September 31, 2015. CEA's members are in agreement that it will be extremely difficult for most of the televisions manufactured for sale throughout 2015 to qualify without having to recertify mid-year after making further changes to their products. Similarly, it would also likely cause many Version 6.1 qualified products to be delisted mid-year.

Many 2015 model year designs have been completed, long before these specifications are finalized. As a result, many 2015 products have - or will be - certified between the end of 2014 and the beginning of 2015. We believe certification bodies will not be prepared to certify pursuant to Version 7.0 within the next few weeks. As a result, these televisions will need to be

recertified mid-year regardless of whether they might already meet the qualification requirements of Version 7.0.

As CEA has noted many times in the past, the commercial introduction of new televisions naturally occurs between the Super Bowl in February and the end of September when retail space for the holiday season is negotiated and finalized. The currently proposed effective date occurs during the manufacturing cycle. Unfortunately, the anticipated timing of the new specification could not come at a more inopportune time for manufacturers.

After consultation with our members, CEA urges the EPA to align the effective date of the new specification with television manufacturing cycles. To align, CEA urges a three month delay in the effective date for sun-setting continued certifications under the old specifications, and a corresponding three month delay the effective date of the new Version 7.0.

Specifically, the earliest possible effective dates that properly align with manufacturing cycles are:

- On August 15, 2015 CBs should be instructed to stop certifying new product submittals to Version 6.1. Note, however, that existing certifications to Version 6.0 and 6.1 should remain valid for the purposes of ENERGY STAR qualification until December 31, 2015.
- Any product manufactured as of December 31, 2015, should meet Version 7.0 requirements to bear the ENERGY STAR mark.

CEA and its members thank the EPA for the opportunity to participate in 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