

Via e-mail: Televisions@energystar.gov

October 29, 2020

Mr. James Kwon
EPA Product Manager, ENERGY STAR for Consumer Electronics
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Mr. Kwon:

The Consumer Technology Association (CTA)® appreciates the opportunity to submit these initial comments to EPA regarding the development of a draft Version 9.0 ENERGY STAR TV specification released September 17, 2020.

As North America's largest technology trade association, CTA is the tech sector. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. CTA owns and produces CES® – the most influential tech event in the world. For many years, CTA has supported and advanced energy efficiency in consumer electronics as part of the industry's broader commitment to environmental sustainability. CTA's comprehensive approach to energy efficiency includes extensive support for the ENERGY STAR program, a foundational role in industry Voluntary Agreements to improve the energy efficiency of set-top boxes and small network equipment, and a lead role in the development of consensus standard test methods for several categories of consumer electronics.

Many of CTA's television manufacturer members have been award-winning partners in the ENERGY STAR program, but participation curtailed sharply under Version 8.0. CTA supports EPA's interest in addressing the shortcomings of the current specification to facilitate broader participation and thereby better promote energy efficiency and consumer education.

An essential first step toward that objective is the establishment of a new consensus test method that is able to provide accurate and consistently repeatable energy usage measurements that can provide a reliable foundation for developing and administering appropriate metrics for a Version 9.0 specification. It is widely agreed that the current test method is outdated and requires modernization. To that end, on October 14, 2020, most of the world's leading television manufacturers, CTA, the Natural Resources Defense Council (NRDC), and the American Council for an Energy-Efficient Economy (ACEEE) together announced a breakthrough [agreement](#) to develop and promote an updated test method for measuring television energy use. The agreement commits the parties to cooperate on the completion of a new test

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method that would better enable “accurate, consistent evaluation of automatic brightness control, motion detection dimming, screen-average luminance and standby power of internet-connected TVs” and then immediately employ a comprehensive test program to validate the new method. Once ready, the parties then committed to jointly promote the adoption of the new test method by standards bodies and regulators, including the U.S. Department of Energy (DOE)¹ and EPA.

While this agreement was only announced recently, it has been under development for months. CTA, the manufacturers and advocates have been engaged in extensive collaboration and testing and are in the late stages of a long process leading up to the formal testing round of the program.

It is important to emphasize that each of the parties to this agreement affirmed that the completion of this new, consensus test method should be viewed as a “*prerequisite* to the development of more meaningful” energy efficiency metrics “to improve the pertinence of the data upon which [such metrics] would be based and measured.” This sequential necessity is because of the shortcomings of the outdated existing DOE test method. Until all these shortcomings are addressed, any premature attempt to finalize specifications for Version 9.0 would be unable to establish appropriate new ENERGY STAR metrics.

Accordingly, EPA should defer consideration of appropriate energy levels for Version 9.0 until the new consensus test method can be used to collect accurate test results. We expect such testing data to be available in Q1 2021. CTA would be pleased to provide regular updates to EPA regarding the progress of these ongoing efforts.

Sincerely,

/s/
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/s/
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¹ It is important to recognize that “any representations made with respect to the energy use or efficiency of televisions must be made in accordance with tests conducted pursuant to” the current DOE test method. *See* 10 C.F.R. Appendix H to Subpart B of Part 430 – Uniform Test Method for Measuring the Power Consumption of Television Sets.