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VIA EMAIL

October 1, 2010

ENERGY STAR Program
Environmental Protection Agency
Washington, DC
ENERGYSTARVerificationProgram@energystar.gov

Re: Proposed Substantive Clarifications to ENERGY STAR Program Requirements for Televisions

Dear ENERGY STAR Program:

Mitsubishi Digital Electronics America (MDEA) is proud to be a leader in the effort to minimize the impact of electronics and manufacturing on our environment, and is pleased to participate in many environmental initiatives, including the ENERGY STAR® program. We have devoted significant resources to participating in the ENERGY STAR program and developing large screen televisions that are very energy-efficient (and meet ENERGY STAR qualification requirements).

In the letter of September 14, 2010,¹ the Environmental Protection Agency (“EPA”) solicited comments on “refinements” of several ENERGY STAR Product Specifications, including Televisions. As an initial matter, the ENERGY STAR Program Requirements for Televisions Eligibility Criteria Draft Version 4.2 has an effective date (shown in Table 4 near line 287) in the past (April 30, 2010).

More importantly, draft 4.2 includes changes which materially and adversely affect MDEA products’ ENERGY STAR qualification due to specific requirements of technologies that are used by MDEA which we have not previously been afforded an opportunity to comment on.

Power Overhang

Power Overhang is newly-defined to mean “[a] power state within On Mode that is intended to facilitate a rapid return to full functionality in the event a product is accidentally switched off.” Requirements are made vis-à-vis Power Overhang in Section 3.3.3:

- i. Any Power Overhang state that occurs after the user has sent a command to switch the product into Sleep Mode, and immediately preceding entry into Sleep Mode, shall be less than 3 minutes in duration.*
- ii. Measured Power during the Power Overhang state shall be less than or equal to the Maximum On Mode Power Requirement (P_{ON_MAX}) specified in section 3.3.1.*

There are at least two reasons for a television to consumer approximately P_{ON_MAX} after a user selects Sleep Mode. The first is as referenced in the definition of Power Overhang, “to remain in a highly-functional ‘ready’ state for a limited amount of time after being switched off by

¹ Letter from Ann Bailey, Chief, ENERGY STAR Labeling Branch, US Env’tl. Prot. Agency, Sept. 14, 2010.

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the user.” To the extent that EPA wishes to limit the amount of time spent in a “ready” state”, we have no comment.

However, some television display technologies require a certain amount of time to transition into Sleep Mode. For example, rear projection DLP televisions – which only MDEA is manufacturing – have a lamp which requires fan-assisted cool-down, and requires exercise of the DLP micromirrors for a period of time during the transition to Sleep Mode.² These are mandatory, necessary operations which extend the service life of the lamp and television. Omitting these steps would cause a significantly decreased product life.

Fortunately, we do not believe that EPA’s intent is to prohibit such operations in an ENERGY STAR-qualified device. We suggest that the following changes to the draft of the Program Requirements v4.2 would achieve EPA’s goal of allowing a short “ready” time, without prohibiting unavoidable maintenance operations.

1. Revise (1)(G)(1)(a) at lines 58-61 as follows (deletions shown as ~~red strikethrough~~, insertions shown as blue underline):
 - a) Power Overhang State: A power state within On Mode that is intended to facilitate a rapid return to full functionality in the event a product is accidentally switched off. This feature is present in some products that are designed to remain in a highly-functional “ready” state for a limited amount of time after being switched off by the user. Cool-down and maintenance functions that are performed during a transition from On Mode to Sleep Mode, that are not intended to facilitate a rapid return to full functionality, are not included in Power Overhang State.
2. Revise section 3.3.3 at lines 186-191 as follows (deletions shown as ~~red strikethrough~~, insertions shown as blue underline):

“3.3.3 Power Overhang:

 - i. Any Power Overhang state that occurs after the user has sent a command to switch the product into Sleep Mode, and immediately preceding commencing transition entry into Sleep Mode, shall be less than 3 minutes in duration.
 - ii. Measured Power during the Power Overhang state shall be less than or equal to the Maximum On Mode Power Requirement (P_{ON_MAX}) specified in section 3.3.1.”
3. Insert new section 3.3.4 after line 191 as follows (deletions shown as ~~red strikethrough~~, insertions shown as blue underline):

“3.3.4 Transition from On Mode to Sleep Mode:

Transition from On Mode to Sleep Mode, excluding the duration of any Power Overhang, shall be less than 9 minutes in duration.”

² Other DLP products have similar requirements but are not covered by the ENERGY STAR program for televisions, for example, DLP front projectors and DLP data projectors.

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Please feel free to contact us if you have any questions or if I may be of any further assistance.

Sincerely,

/s/

Harlan Rogers
Senior Manager, Product Compliance
Mitsubishi Digital Electronics America

Cc: Katharine Kaplan