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United States Environmental Protection Agency  
Office of Air and Radiation  
Washington DC, 20460

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Ms. Radulovic,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to ENERGY STAR's Televisions Specification Version 7 Draft 1. After a careful review of the proposed revisions, this letter is submitted on behalf of NEEP, Efficiency Vermont, and the Cape Light Compact.

From a high level, NEEP is very supportive of ENERGY STAR revisiting this product category. The television market has moved very quickly and the efficiency levels that products are reaching are impressive. Historically, a large percentage of televisions have been able to meet ENERGY STAR qualification, therefore we feel that revisiting the specification levels at this time is prudent. We caution that once the specification goes into effect, that percentage may grow significantly (as was witnessed in previous versions of this specification). As such, we encourage ENERGY STAR to carefully reanalyze the projected market share and ensure the specification levels are sufficiently stringent to truly capture a subset of the market, not the majority.

Additionally, although NEEP is supportive of the on-mode and standby-passive levels put forward in this specification, we feel that there could be an opportunity to reach greater efficiency by slightly reducing the allowed wattages. We feel strongly that there should be no upward allowances or increases in the allowed wattages in on-mode and standby-passive mode, and feel that manufacturers should be able to reach the proposed modes with relative ease. Regarding standby-active, NEEP is concerned about the current system in which performance is measured, and until those issues are resolved, specific levels cannot be supported. We caution ENERGY STAR to not be influenced by claims of technological limitations in achieving the levels set by a final specification.

Beyond these more general thoughts, the following are some specific reactions and responses to elements of the specification:

- 2.1.1: NEEP supports removing the language and feels that "marketed to the consumers as a TV" is clear enough language.
- 2.2.2i: NEEP is supportive of ENERGY STAR's proposal to leave out TVs with a main battery.
- 3.2.5i: From our experience with the new game console models and the additional energy that these optional settings would bring, NEEP recommends EPA required manufacturers to set a default timeframe for when these settings will be enabled, in addition to whenever the device is on and operating. 5pm-10pm seems reasonable for a default. By setting a default, you are asking the viewer to opt out of the setting rather than opt in; this will help to ensure greater adoption. NEEP also supports the inclusion of an on-screen explanation that any change in settings may cause TV to be less efficient.
- 3.2.6: Generally, as long as there is not an energy allowance for the added thin client capability, NEEP supports the inclusion and recognition of this ability of the TV. NEEP feels that this added functionality should be listed in BOTH the user manual AND an on-screen prompt with the website to get more information about compatible service providers listed easily. Additionally, NEEP recommends including an explanation for why the Thin Client capability of the TV should be used rather than consumers sticking to their traditional set-top-boxes. If somehow an allowance is under consideration for the thin client capability, NEEP has major reservations and would ask ENERGY STAR to find a creative approach to ensure that



consumers are not using both an STB and the Thin Client element of the TV for their needs (and therefore increasing total load, not reducing).

- 3.4.2: NEEP supports this change
- 3.5.1: NEEP supports the suggested levels for with and without full network connectivity. This will help TVs better integrate into home energy management systems and the levels listed seem realistic, however we recommend additional research to ensure that the 1W allowance for full network connectivity is appropriate. From review of the QLP, it appears that most televisions reporting full network connectivity are able to meet this mode within 1W and while some manufacturers may not be able to meet this at present, if this data is accurate, we feel that an energy allowance should not be warranted at this point. However, we understand that some of this data may be flawed as manufacturers may not have understood the different modes. Generally, we support the lowest wattage allowance that is realistic and support any language changes that might ensure greater clarity.
- 3.6.1: It is our understanding that the 65% threshold has generally prevented a loophole for this setting. If that level continues to meet consumer expectations and prevent a manufacturer loophole, then NEEP is supportive of this continued level.

Additionally, while the market share for 3D TVs may be dwindling, it is still disconcerting that the current test procedure does not test 3D TVs in 3D mode. As such, those certified televisions may be using significantly more energy than we realize. For Version 7, it may be worthwhile to see how many 3D TVs are able to meet the spec; if none can achieve the levels set out, then perhaps further analysis of this issue is unnecessary. However, if there are products that could meet the proposed spec levels, then NEEP would urge the EPA to look more closely into how to ensure the energy consumption in 3D mode is kept in alignment with the goals and levels set forward by ENERGY STAR.

Finally, NEEP strongly supports EPA's efforts to include Ultra HD televisions into the specification. As the market share for UHD TVs is expected to grow significantly, we think ENERGY STAR has the opportunity to be ahead of this trend from the beginning with this Version 7 spec. We support further analysis with additional data into whether an adder path for higher resolution may be appropriate and are not immediately opposed to that potential allowance as long as the levels set are sufficiently stringent to make a difference in the energy consumption of these UHD products. We encourage ENERGY STAR to ensure that the UHD specification levels are realistic such that UHD products will seek ENERGY STAR certification yet help to curtail the wide range of efficiencies for UHD products currently in the market. We do not want a specification that would not allow or would discourage UHD televisions from being certified, as it is clear that their energy consumption ranges significantly and in some cases is very high. We would like UHD technology to become efficient, much as other television technology has, and ENERGY STAR has the ability to help the technology evolve in the right direction.

Thank you again for offering this opportunity to provide comments on this draft specification. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', written over a light blue horizontal line.

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