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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 2. After a careful review of the proposed revisions and participation in the EPA led webinar on September 16th, we respectfully submit these comments on behalf of NEEP and Efficiency Vermont (herein referred to as NEEP).

In general, NEEP is very supportive of the direction ENERGY STAR is taking for this product category. Our comments revolve around the theme of EPA maintaining strong efficiency levels and collecting appropriate data from manufacturers to help inform future versions of this specification. Our specific comments are as follows.

NEEP supports EPA's proposal for on-mode and discourages the EPA from adjusting the on-mode requirements upward.

In general, NEEP is very supportive of the direction EPA is taking towards addressing on-mode. Specifically, NEEP supports the on-mode levels proposed by the EPA in Draft 2 of the specification. Since televisions have proven themselves to rapidly be able to meet the on mode requirements ENERGY STAR has put forward in the past, we strongly feel that the on mode requirement must be aggressive in order to hit approximately 25% of products by the effective date of the specification. Setting the specification such that 16% of the current products meet it seems realistic and we urge EPA to keep this level and not to adjust upward, as we feel the products will evolve to meet the proposed levels.

NEEP supports EPA's stance on Ultra HD televisions.

With regards to EPA's proposal to recognize Ultra HD televisions, we support the proposed allowance. There are sufficient models presently available for us to feel comfortable with this proposed level, and we caution to the EPA not to consider a larger allowance on the UHD products as reaching the proposed levels has been proven possible.

The definition EPA has put forward for UHD televisions only stipulates the pixel levels. We would recommend EPA consider expanding this definition to include other identifiers for Ultra HD, perhaps based off of the CEA's definition for UHD, to prevent the possibility of HD TVs qualifying for the allowance but not meeting consumer expectations of the UHD experience. This would close the loop hole for HD products and allow for maturation of the category that is already occurring.

NEEP and Efficiency Vermont strongly urge EPA to consider the expiration date for the UHD allowance to be set at 12/31/2016 and no later. Since most new models are presented at the CES show in January, the timing of the May deadline would mean the 2017 line of products would likely not be influenced. Since the V8 specification process is likely to have begun in 2016, if as that process begins the EPA determines the allowance on UHD is still crucial, we recommend that the EPA could extend the expiration date at that time.

NEEP supports the proposed levels for Standby-Active Low, Standby Passive, and Standby Active High while encouraging the EPA to collect sufficient data to support these levels.



NEEP supports the proposed 3W limit for Standby-Active Low assuming that this level is well substantiated.

NEEP is generally supportive of EPA setting a Standby Passive mode limit of .3W.

Regarding Standby-Active High, NEEP is okay with a 15 minute return to standby-low requirement.

NEEP encourages EPA to revisit and pay close attention to the treatment of the Quick Start and Voice/Gesture recognition modes.

With regards to Quick Start, NEEP recommends that EPA set an explicit limit of 3W and no higher to ensure that the television is not running unnecessary programs using large amounts of energy to enable the Quick Start functionality. Additionally, we recommend that EPA considering asking manufacturers to report whether their televisions have Quick Start, if Quick Start is enabled, the power used in quick start, and the time it takes to restart when Quick Start is enabled. This data will help ensure future versions of this specification appropriately account for the capabilities in Quick Start mode.

NEEP also recommends that EPA set a 3W limit and no higher on the voice/gesture recognition setting for televisions, as well as ask manufacturers to report whether their televisions have voice/gesture recognition, if voice/gesture recognition is enabled, the energy used in voice/gesture recognition, and the amount of time spent with voice/gesture recognition enabled. This data will help ensure future versions of this specification appropriately account for the capabilities in voice/gesture recognition mode.

NEEP reiterates our comments from Draft 1 regarding setting a default timeframe for either Quick Start enabled, Voice/Gesture recognition, or both. NEEP recommends EPA consider requiring 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.

NEEP supports EPA's proposal regarding luminance requirements and non-default picture settings.

NEEP supports EPA's proposed luminance requirements and continues to caution the EPA to ensure these requirements prevent a loop-hole from emerging for manufacturers.

NEEP supports EPA's proposal for non-default picture settings to be recognized as ENERGY STAR qualified if they are able to meet the on-mode requirements set forth by EPA.

Finally, NEEP would like to reiterate the comments made in draft 1 regarding 3D televisions. 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.

Thank you again for offering this opportunity for NEEP and Efficiency Vermont 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', with a long horizontal flourish extending to the right.

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