



Verena Radulovic, Product Manager
ENERGY STAR for Consumer Electronics
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 Final Draft. After a review of the proposed revisions, we respectfully submit these comments.

In general, NEEP is very supportive of the specifications laid out by ENERGY STAR. We feel that ENERGY STAR appropriately considered the comments we had offered for the previous drafts. We feel that the energy levels established for on-mode consumption, standby-passive, and standby active low seem fair and appropriate. Additionally, we appreciate the decrease in Ultra-HD (UHD) allowance given the adjustment in on-mode requirements.

We do have continued concerns regarding how long the UHD adder will be in effect. Given the rapid uptake of UHD in the market, as noted in a recent CNET article,¹ if there is not a date set for revision or expiration of the adder, we could arise at a situation where there is little incentive to drive energy for UHD down over multiple product cycles. It could be possible that when ENERGY STAR starts the Version 8 Specification process, we may not have sufficient understanding of what the efficiency capabilities are for UHD televisions. We suggest adding back a UHD adder expiration date of 12/31/16 or whenever the Version 8 Specification revision begins, whichever event takes place first. The television market can change very quickly. If there is no adder expiration date and ENERGY STAR, for whatever reason, was not able to "closely monitor" and anticipate UHD changes in the market, it could mean Version 8 of the television Specification may not be as strong as possible.

Otherwise, we are very supportive of this final draft specification. Thank you again for offering this opportunity for NEEP to provide comments on this specification and for leading an informative and productive process. 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 horizontal line extending to the right.

Claire Miziolek
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¹ <http://www.cnet.com/news/4k-tv-shipments-soar-to-6-4m-in-2014/>