

December 17th, 2014

Ms. Verena Radulovic  
Product Manager  
ENERGY STAR Program  
U.S. Environmental Protection Agency  
Via e-mail: [televisions@energystar.gov](mailto:televisions@energystar.gov)

**Re: Panasonic Comments on ENERGY STAR Televisions V7.0 Final Draft Eligibility Criteria:**

Panasonic appreciates the opportunity to comment on ENERGY STAR Televisions V7.0 Final Draft Eligibility Criteria. As a leading manufacturer and marketer of all television technologies, Panasonic is a strong supporter of the ENERGY STAR brand and its program objectives, which have been exemplified in the current lineup of our most efficient TV models ever.

**Effective Date:**

We believe that there is insufficient lead time between the final specification (expected December 31, 2014) and the effective date of September 30, 2015, as there are several proposed changes to power levels, functionality, and user interfaces which will require additional time to design and fully implement. Another significant issue with a September 30, 2015 effective date is that it occurs within the manufacturing window for many of the 2015 television models. These models will lose their ENERGY STAR TVs V6.1 certification during an important manufacturing period for the end of the year holiday season. This will cause considerable disruption if these 2015 models are unable to be retested and certified to the new Version 7.0 specification.

We appreciate the fact that upon completion of the Version 7.0 specification development process (expected December 31, 2014), manufacturers may elect to have their Certification Body (CB) certify their eligible products to the Version 7.0 requirements. However, it is unrealistic to expect that many of the 2015 models which are already designed and tested will be able to meet the robust Version 7.0 specification without significant redesign. Therefore, the only choice for the majority of these models will be to certify to Version 6.1 prior to the beginning of their manufacture starting now in many cases, and then losing their certification on September 30, 2015. This will cause major market disruption since all stakeholders do not want to see the same model with and without ENERGY STAR certification. The net result may be the premature end of manufacture of many 2015 models and perhaps even a shortage of ENERGY STAR certified televisions.

To remedy these problems, we propose the effective date be delayed to February 29, 2016 which will better accommodate the introduction of the 2016 models. At the same time, it will allow the 2015 models certified to Version 6.1 to be continued to be manufactured until the introduction of the 2016 models.

We also propose a three month delay to August 15, 2015 for the date when CBs will be instructed to stop certifying new product submittals to Version 6.1.

**Minor Editorial Comments:**

**Section 2.1.1 Included Products:**

We recommend adding the word “or” to the following:

(2) capable of being powered from a wall outlet **or** with an external power supply;

**Section 3.4.1 Standby-Passive Mode Requirements:**

The reference to Section 7.3.3 should be to Section 7.3.2.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with EPA has provided a valuable tool by which consumers can make better informed choices about their purchases of energy efficient products.

As always, Panasonic appreciates the opportunity to comment on the ENERGY STAR Televisions V7.0 Final Draft Eligibility Criteria and welcomes the opportunity to further discuss our views with you.

Sincerely,

Mark J. Sharp  
Group Manager  
Panasonic Corporation of North America