

SHARP LABORATORIES OF AMERICA

Via e-mail:
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December 16, 2014

United States Environmental Protection Agency
Office of Air and Radiation
Washington, D.C. 20460

Subject: **ENERGY STAR[®] Final Draft Version 7.0 Specification for Televisions**

COMMENTS OF SHARP LABS OF AMERICA

SHARP is an enthusiastic ENERGY STAR Partner and is committed to building high-efficiency, environmentally advanced products that deliver top performance to our customers. The ENERGY STAR program continues to be the most effective approach for SHARP to communicate the low power consumption of our products to retailers and consumers.

On December 3rd, EPA released ENERGY STAR Final Draft Version 7.0 Specification for Televisions.

SHARP offers the following comments:

SHARP supports the technical content of the specification

SHARP is pleased that many of our comments were accepted and that related changes were made to the latest version of the specification. These topics include the user interface related to sections 3.2.4 and 3.2.5, the use of a broader dataset, easing of the On Mode power requirements for large screen sizes, removal of the May 1, 2017 expiration date for the ultra-high resolution allowance, and capping the luminance ratio at 228 cd/m².

SHARP notes that the ultra-high resolution allowance was reduced from 55% to 50% and though SHARP would prefer a higher allowance, we also understand the data-based justifications of EPA's position.

Effective Date

SHARP remains most concerned about the timing of the effective date. If the final specification is not published until the end of December, 2014 and becomes effective on September 30th, 2015, it will be extremely difficult for the majority of the 2015 model line to qualify without having to recertify and potentially make expensive running changes to the products. It would also likely cause many 2015 v6.1 qualified products to be delisted mid-year, which would result in expensive running changes to remove Energy Star logos from various materials and firmware.

Practical concerns regarding the dates include:

- Key characteristics of many 2015 model-year designs are already completed, before V7.0 is finalized.
- Many 2015 products would be certified in Q4 of 2014 or Q1 of 2015. Few, if any CBs will be able to certify to the new specification on January 1st, meaning that such products would need to be recertified regardless of the efficiency of their design.

- The introduction of new products to the marketplace occur almost exclusively between the Super Bowl in February and September 30th when shelf space for the holiday selling season is allocated. The current effective date occurs in the heart of the manufacturing cycle, rather than during the likely model-year transition for any typical television product.

SHARP proposes that the effective dates be delayed in order to align with television market cycles. The earliest possible alignment would require a three month delay. SHARP recommends the following modifications to the timeline:

- On **August 15**, 2015 CBs will be instructed to stop certifying new product submittals to Version 6.1. Note, however, that existing certifications to Version 6.0 and 6.1 will remain valid for the purposes of ENERGY STAR qualification until September 30, 2015.
- Any product manufactured as of **December 31**, 2015, must meet Version 7.0 requirements to bear the ENERGY STAR mark. All certifications of products to the Version 6.0 and 6.1 specifications will be invalid for purposes of ENERGY STAR qualification and CBs will only submit product models certified to Version 7.0 to EPA.

Conclusion

SHARP strongly supports the ENERGY STAR program and supports the technical content of ENERGY STAR V7.0 for Televisions. In addition, SHARP highly recommends a three month delay of key effective dates in order to align with television market cycles.

We hope that EPA strongly considers SHARPs comments as we work together to create an effective, accurate, and efficient next version of the ENERGY STAR program for televisions.

Respectfully submitted,

SHARP LABORATORIES OF AMERICA

By:  _____

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