

August 5, 2021

James Kwon
EPA Product Manager
ENERGY STAR for Consumer Electronics
1200 Pennsylvania Avenue NW
Washington DC, 20004

Sent by email to: Kwon.James@epa.gov

Re: Samsung Comments on Draft 2 Version 9.0 TV ENERGY STAR specification

Dear Mr. Kwon:

Samsung Electronics America, Inc. (Samsung) respectfully submits these comments on EPA's Draft 2 Version 9.0 TV ENERGY STAR specification. A world leader in technology, Samsung is the leading smart TV brand in the U.S. committed to providing energy efficient products to U.S. consumers. Samsung has won the ENERGY STAR Partner of the Year Award for Sustained Excellence eight times, including the ENERGY STAR Corporate Commitment Award in 2021 – a recognition that was last granted nine years ago.

Test Procedure and Criteria

Samsung greatly values the ENERGY STAR program and our strong partnership over the years. We have continuously supported the program through specification development, investment in manufacturing ENERGY STAR products, and robust engagement. While we believe the Version 9 criteria are challenging, EPA has provided solid reasons for the overall transition to measuring dynamic luminance instead of setting a minimum static luminance. Therefore, we agree with the overarching approach that EPA is taking on test procedure and most criteria in the specification.

Concerns with Proposed High Contrast Ratio (HCR) Adjustment Factor

However, Samsung has an overriding concern with a key aspect of the draft specification as outlined below.

ENERGY STAR is intended to reward efficiency in a technology-neutral way, and providing an HCR adjustment factor that lowers the bar for OLED technology would not be technology-neutral. EPA acknowledges that there is no standard method for measuring HCR and proposes

to base it on manufacturers' claims of "infinite" contrast—a subjective criterion that may not apply to real-world conditions experienced by consumers. Moreover, EPA has provided no evidence that this "infinite" HCR is preferred by consumers more than other picture-enhancing technologies, such as high color volume, for which EPA has not proposed any adjustment factor. Plasma TVs in the past had HCR, yet were not given an adjustment factor to help them meet ENERGY STAR more easily. EPA should follow its prior practice.

EPA has indicated that its testing shows that no current OLED TVs would qualify, even with the HCR adjustment factor, and therefore, the proposed specification is "aspirational" and will provide an incentive for continued improvement in OLED efficiency. Importantly, though, Samsung's testing indicates that there are OLED models currently in the market that would qualify with the adjustment factor

Samsung also has concerns with giving an HCR adjustment factor with a phase-out date. That approach still would not meet the fundamental criterion of being technology-neutral. However, if EPA decides to proceed with such a time-limited HCR adjustment factor, we would strongly urge EPA to lower the adjustment factor to 5% or less, regardless of screen area, in order to minimize the technology bias.

Conclusion

Samsung has invested heavily in energy efficient technologies as part of our product design process, which we believe is valuable for consumers and the environment alike. We greatly value the ENERGY STAR program and would appreciate EPA's thorough consideration of our comments. Samsung also notes that the Natural Resources Defense Council highlighted similar concerns to our own regarding a HCR adjustment factor in their public comments to Draft 1 of the specification.

Samsung sees ENERGY STAR as a gold standard for public-private partnership. It is in that cooperative spirit that we respectfully urge the removal, or at a minimum the significant reduction to 5% or less, of the HCR adjustment factor for a technology-neutral approach. We would be pleased to discuss these critical matters with you at your convenience.

Sincerely,

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