



January 7, 2022

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

Sent by e-mail to: Kwon.James@epa.gov

Re: Samsung Comments on Final Draft for TV ENERGY STAR Specification

Dear Mr. Kwon:

Samsung Electronics America, Inc. (Samsung) respectfully submits these comments on EPA's Final Draft for the TV ENERGY STAR specification. A world leader in technology, Samsung is the leading smart TV brand in the U.S. and is a company 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 otherwise nine years ago.

Concerns with Proposed High Contrast Ratio (HCR) Adjustment Factor

Samsung continues to have an overriding concern with EPA's decision to maintain the HCR adjustment factor in its Final Draft. 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. Allowing an HCR adjustment conflicts with precedent as plasma TVs had HCR, yet were not given an adjustment factor to help them meet ENERGY STAR more easily. EPA should follow its prior practice.

The HCR adjustment will discourage energy efficiency. It therefore would undermine ENERGY STAR's objectives and consumers' expectations. Samsung has submitted additional data to EPA, which we request the agency to take into account. Samsung's supplemental test data shows that certain OLED TVs would qualify even without an adjustment factor. Samsung's data also demonstrates an efficiency improvement of 16.9% when comparing tests between a 2020 model and its 2021 next generation model. This demonstrates that technological advances will allow many OLED models qualifying in 2022 and underlines that there is no need for an approach that is not technology neutral through an adjustment factor. Moreover, there are some models on the cusp of qualifying without an adjustment. Therefore, it is conceivable that similar OLED TVs with adjustments to Automatic Brightness Control (ABC) or power/luminance algorithms can implement efficiency gains to meet the specification with no adjustment factor. Rather than

rewarding inefficiency through an adjustment factor, ENERGY STAR should remain an aspirational goal to incentivize manufactures to meet the efficiency targets similar to OLED TVs on the market today that would qualify without an adder under the revised specification. EPA should not relax its approach and should remove the adjustment factor entirely.

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

Respectfully submitted,

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