



October 21, 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 Limited Topic Proposal for TV ENERGY STAR Specification

Dear Mr. Kwon:

Samsung Electronics America, Inc. (Samsung) respectfully submits these comments on EPA's Limited Topic Proposal 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 appreciates EPA issuing a Limited Topic Proposal on the concerning High Contrast Ratio Adjustment factor. Samsung continues to have an overriding concern with the Limited Topic Proposal (LTP). 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.

First, the HCR adjustment factor's use of manufacturers' unrealistic "infinite" contrast claims is problematic. EPA acknowledges that there is no standard method for measuring HCR and proposes to base it on manufacturers' claims of "infinite" contrast—a subjective use condition that may not apply to real-world conditions experienced by consumers. Moreover, EPA has not cited any 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. Moreover, 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.

Second, the HCR adjustment will not encourage energy efficiency. It therefore would undermine ENERGY STAR's objectives. EPA's LTP shows that current OLED TVs would qualify with a 12% adjustment factor. But Samsung has conducted additional testing that shows that certain OLED TVs would qualify even *without* an adjustment factor. Therefore, EPA's proposal is not "aspirational", as EPA originally intended, and it will not provide an incentive for continued improvement in OLED efficiency. In addition to OLED TVs that qualify without an HCR adjustment factor, Samsung's recent testing indicates that there are also several OLED models currently in the market that would qualify with a smaller adjustment factor than the one reflected in the LTP. In fact, Samsung's testing shows that a certain 2021 OLED model that would qualify with a 7.9% adjustment factor would have needed a 24.8% adjustment factor for its corresponding 2020 model to qualify. This is another reason why OLED TVs do not need any adjustment factor. Technological advances would result in many OLED models qualifying in 2022, given the 16.9% improvement between 2020 and 2021 and the fact that some qualify even without an adjustment factor. Therefore, 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 comments. Samsung also notes that the Natural Resources Defense Council highlighted concerns similar to our own regarding an HCR adjustment factor in its 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 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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