



Sony Electronics Inc.

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October 12, 2010

Ms. Ann Bailey
Chief, Energy Star Labeling Branch
U.S. Environmental Protection Agency
Washington, DC
ENERGYSTARVerificationProgram@energystar.gov

cc: Katharine Kaplan

Dear Ms. Bailey:

On behalf of Sony Electronics Inc, I respectfully submit the following comments on the Proposed Revisions to ENERGY STAR Program Requirements Product Specifications for Televisions, Computers and Audio/Video Products.

We take this opportunity to reiterate to the ENERGY STAR program administrators to provide sufficient time to allow for proper vetting, discussions and internal analysis. For many companies the design activities are carried out overseas. Considering the technical nature of the revisions, ample and sufficient time is needed to study and analyze the impact each revision represents. These proposed changes, even if seemingly insignificant, require considerable discussion internally from dedicated resources. Sony clearly recognizes the time constraints the ENERGY STAR program administrators face. Sony believes together we can work effectively and efficiently to find the perfect blend to meet our demands.

**ENERGY STAR Program Requirements for Televisions
Eligibility Criteria (Draft Version 4.2)**

- Version 4.2 and Version 5 Separation

Sony appreciates the decision of the ENERGY STAR program administrators in separating versions to minimize confusion. The separation of these versions will remove the burden associated with entities that penalize efficient products ahead of the effective date of version 5. We request the ENERGY STAR to remove access to version 5 while not in effect, and request access be granted at a date closer to its effective date.

- Power Overhang State

While we recognize the need to include a definition for this state to remove concerns consumers and stakeholder may have, the ENERGY STAR utilized the on-mode power consumption of televisions to determine the impact this state represents and to develop a 3 minute time allowance in this mode. The rationale does not take into consideration

televisions that utilize power levels similar to those observed in Download Acquisition Modes. Sony asks the ENERGY STAR to allow a 6 minute or more allowance in this state for products that consume significantly less energy compared to on-mode power levels. The net impact on TEC from these televisions that consume less power in the overhang state will be significantly less than 5KWh per year calculated using on-mode power levels.

Alternatively, the ENERGY STAR could allow tagging the energy consumption in power overhang state to the total DAM allowance provided the television operates at DAM power levels in power overhang modes.

Sony believes that if a time limitation is to be implemented; such time limitation must account for the actual power consumed and the overall impact on TEC. Products with higher power levels in this mode may be limited to lower time allowances. Televisions with lower power levels in this mode should be allowed more time to execute the regularly scheduled activities in power overhang mode without the risk of exceeding the total impact on TEC.

- Hospitality Televisions Requirements

Sony questions the need to set a DAM Power limit of 1W or less for hospitality products where this feature is always on. The 1 watt limit is practically impossible to meet and defines an E DAM to be 0.024 KW per day. Provided the TEC shop as described in Equation 3 is not exceeded, manufacturers should be allowed to provide the service this technology is intended for whilst achieving the ultimate goal of the ENERGY STAR of meeting the power limits set in the program requirements. The proposed revision is, not explicitly, setting a stringent requirement and penalizes products that have an always on DAM feature.

- Number Of Units Required for Testing

Sony is in complete opposition of the newly added requirement to test two additional units if the test results for any operational mode power measurement are within 10% of ENERGY STAR requirements. Such requirement triples the burden and cost to manufacturers to qualify products. It is unnecessary and unjustifiable. We believe only products that exceed the ENERGY STAR power requirements should be subject to this proposed requirement. We request the ENERGY STAR to consider a deeper analysis and evaluation and the impact this proposed revision represents.

- Effective Date

Sony strongly requests the ENERGY STAR to update the effective date of the program requirements v4.2. The effective date described in the proposed revisions is the same as that date of the previous version. The ENERGY STAR is introducing small, yet new requirements that were not required in the previous version. Some models manufactured after April 30, 2010; that meet the current program requirements of version 4.1 do not meet some of the proposed revisions (i.e. power overhang state, DAM for Hospitality TVs). Retroactive dates in program requirements confuse consumers. There are other risks associated with retroactive dates that Sony would like to discuss separately with the

ENERGY STAR. Therefore, we strongly request to allow sufficient time for manufacturers to make the necessary product modifications to comply with the new proposals. We request the effective date be January 31st, 2011 or later.

ENERGY STAR Program Requirements for Audio/Video Products Eligibility Criteria (Draft Version 2.1)

- Table 1 and Table 2 (Use of consistent terms)

Table 1 (sleep mode power allowances) describes under the product function column, the following: **Each In-use Networking**. Table 2 (on mode power allowances) describes under the product function column, the following: **In-use Networking**. We believe the EPA intention is to describe identical product functions. To avoid confusion, we request the EPA to use identical terms when describing the same product functions.

- Amplifier Efficiency Requirements

Equation 4: Calculation of Amplifier Efficiency. In this equation, it is evident that P DISC should not be accounted for when calculating amplifier efficiency. This equation fails to account for Idle State Power Allowances. Idle State Power should be part of the efficiency equation in order to accurately calculate **Amplifier** Efficiency. We recommend the ENERGY STAR to modify equation 4 as follows:

$$n = \frac{P_{out}}{P_{in} - P_x}$$

- Where P_x is,
P disc: is the measured power during audio playback for products without AV inputs that must rely on an optical disc player for audio signal input. Or
P idle: is the power allowance for other applicable product functions unrelated to amplifier functions.

Sony recognizes a better use of terms or variables may be suitable to develop the equation and the statements that describe P disc and P idle. We welcome alternative language that will accurately represent the concern the equation represents in calculating amplifier efficiency.

- Test Method

Sony believes there is a need to make an editorial correction in describing Super Audio – Compact Disc. The correct abbreviation is SA-CD. Under the test method, it is described as SACD. We request the ENERGY STAR to make this small correction.

- Number Of Units Required for Testing

Sony is in complete opposition of the newly added requirement to test two additional units if the test results for any operational mode power measurement are within 10% of ENERGY STAR requirements. Such requirement triples the burden and cost to manufacturers to qualify products. It is unnecessary and unjustifiable. We believe only

products that exceed the ENERGY STAR power requirements should be subject to this proposed requirement.

- Effective Date

As requested in the comments for the Television Program, we ask the ENERGY STAR to review the potential impacts and risks associated with setting an effective date that is retroactive in nature. The effective date described in the proposed revisions is the same as that date of the previous version. We strongly request the ENERGY STAR to set a new effective date. At earliest, the effective date should be the same as the official date of publication of the revised version. There are other risks associated with retroactive dates that Sony would like to discuss separately with the ENERGY STAR.

ENERGY STAR Program Requirements for Computers Eligibility Criteria (Draft Version 5.2)

- Power Supply requirements

In Table 12 in section 4.1.1 it is referenced to test method “EPRI Generalized Internal Power Supply Test Protocol, Rev. 6.4.2. This test method is designed for Internal Power Supplies (IPS). Table 12 requires the use of such test method for IPS and Multi-output External Power Supplies and Single-output External Power Supplies with integral Cooling. Sony would like to request the ENERGY STAR for clarifications on how it was determined that a test procedure for IPSs can be used for EPSs; and more importantly, for Multi-output EPSs.

In addition, Power Requirements for Multi-Output EPSs are not described in the ENERGY STAR proposed version 5.2. Table 1 in section 3.2.2 only addresses requirements for IPSs and EPSs with Integral Cooling. Sony would like to request the ENERGY STAR for further clarification in interpreting this section.

- Number Of Units Required for Testing

Sony is in complete opposition of the newly added requirement to test two additional units if the test results for any operational mode power measurement are within 10% of ENERGY STAR requirements. Such requirement triples the burden and cost to manufacturers to qualify products. It is unnecessary and unjustifiable. We believe only products that exceed the ENERGY STAR power requirements should be subject to this proposed requirement.

- Effective Date

As requested in the comments for the Television and Audio/Video Programs, we ask the ENERGY STAR to review the potential impacts and risks associated with setting an effective date that is retroactive in nature. The effective date described in the proposed revisions is the same as that date of the previous version. We strongly request the ENERGY STAR to set a new effective date. At earliest, the effective date should be the same as the official date of publication of the revised version. There are other risks

associated with retroactive dates that Sony would like to discuss separately with the ENERGY STAR.

Thank you in advance for your careful consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim McGowan", written in a cursive style.

Timothy McGowan
Vice President, Service Engineering
Sony Electronics, Inc.