

25 Jul 2012



Ms. Verena Radulovic
Product Manager, ENERGY STAR® for Consumer Electronics
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, DC 20460

Re: Best Buy Co., Inc. comments on Final Draft Version 6.0 ENERGY STAR TV Specification

Dear Ms. Radulovic:

We are writing to submit comments on EPA's ENERGY STAR version 6.0 TV Final Draft on behalf of Best Buy Co., Inc. (NYSE: BBY), a leading multi-channel global retailer and developer of technology products and services. Every day our employees - 170,000 strong - are committed to helping deliver the technology solutions that enable easy access to people, knowledge, ideas and fun. We are keenly aware of our role and impact on the world, and we are committed to developing and implementing business strategies that bring sustainable technology solutions to our consumers and communities. For information about Best Buy, visit www.bestbuy.com. We offer the following detailed comments intended to strengthen the ENERGY STAR label and help electronics consumers in making sound product selections.

Regarding clause 3.3.1 "On Mode Requirements" for Automatic Brightness Control (ABC), we believe that TVs with ABC enabled by default should continue to report On Mode measured at 0 and 300 lux, weighted (status quo.). We base our opinion on the following data:

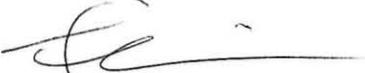
- About 12.5% of television viewing is done at 0 to 1 lux (11.6% according to CEA data and 13.1% according to CLASP data).
- About 25% of viewing is done in dark conditions (under 7.1 lux according to CEA data and under 4.6 lux according to CLASP data).
- According to CEA data, 50% of viewing is under 14.0 lux while CLASP data shows 50% of viewing is under 15.1 lux.
- According to CEA data, only 2.5% of viewing occurs at 300 lux or greater while the CLASP data shows that 1.9% of viewing occurs at 300 lux or greater.

Therefore, we believe the 0 lux measurement point is a reasonable, representative measurement condition. It is balanced by the worst case measurement condition of 300 lux. By contrast, the proposed method in ENERGY STAR v. 6.0 for TVs changes the television out of the out-of-the-box state and makes the measured value less accurate for ABC-enabled televisions.

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The existing ENERGY STAR proposal would not be in harmony with FTC EnergyGuide nor the State of California. We believe that harmonization with the FTC EnergyGuide will create a better experience for our customers by reducing conflicting and therefore confusing energy data.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Cassidy', with a long horizontal flourish extending to the right.

Tim Cassidy
Sr. Manager, Compliance and Product Safety

A handwritten signature in black ink, appearing to read 'Thad Carlson', with a long horizontal flourish extending to the right.

Thad Carlson
Sr. Manager, Environmental Sustainability