



June 17, 2009

Kathleen Vokes
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: ENERGY STAR Audio/Video Draft Specification Framework Version 2

Dear Kathleen:

On behalf of our 1.2 million members and e-activists, the Natural Resources Defense Council (NRDC) respectfully submits its comments on the second version of the ENERGY STAR Draft Specification Framework for Audio/Video Equipment distributed in June, 2009. Thank you for the opportunity to provide input on this document and we look forward to the work ahead.

NRDC is pleased by the great effort undertaken by ENERGY STAR to provide a specification to recognize the energy efficient products across a very complicated and broad field of product functionalities. We are generally supportive of the changes in the second version—in particular the use of modal limits for A/V products and their respective functionalities. To get the clearest and least gameable spec with proven results in the marketplace, we recommend:

- a) No distinction between “residential” and “commercial” products.
- b) Caution when exempting products from mandatory Auto Power Down (APD) as default
- c) Continue to use modal power limits instead of Total Energy Consumption (TEC)

Commercial and Consumer Products

By employing modal limits as described in version 2, it is not necessary to distinguish between “residential” and “commercial” products as a means to categorize. The distinction is only useful for determining usage patterns, which are not needed for testing modal limits. Furthermore, creating this distinction would seem to only provide an avenue for gaming the program by allowing a given manufacturer to apply for either a Commercial or Residential test method, whichever may be easier to achieve for a given product.

APD Exemptions

We are exceptionally pleased with the requirement that all products be shipped with APD enabled by default. NRDC strongly agrees with the statement in the draft specification: “...the most significant energy savings will be achieved through the broad implementation of APD functionality and by setting limits on both ON mode and SLEEP mode power consumption.” However, we recognize that some product uses may conflict with APD, such as life and safety emergency equipment. We recommend the APD “on by default” requirement be maintained, but products with direct life and safety emergency uses (i.e. PA systems) be exempted,

Modal Power Limits

NRDC is very happy to see the inclusion of modal power limits in this second version of the specification. Unless overwhelming data proves the opposite, modal power limits will surely achieve the most energy savings available. For a specification covering such a broad array of diverse product types and functionalities, many products intended for one type of consumer could easily end up with another type and the estimated duty-cycles would then have no connection to real-world use in many applications. Should industry provide such data to prove duty-cycles for certain pieces of equipment, we would caution against applying TEC for those products, as it would only provide unnecessary complications to the overall A/V specification.

In addition, we hope that EPA will set the modal power limits high enough to make the ENERGY STAR logo a distinction for the top 25% of the A/V market.

Conclusion

The A/V specification has improved much since the last draft and we recognize and support the hard work of EPA staff and stakeholders involved to provide the most effective, simple, least gameable and future-minded specification. With the inclusion of the comments included in this letter we fully support the effort and await the next version.

Thank you for considering these comments. If you have any questions, please feel free to contact Nick Zigelbaum (415-875-6100, nzigelbaum@nrdc.org) or Pierre Bull (212-727-4606, pbull@nrdc.org) at any time.

Sincerely,

Nick Zigelbaum
Energy Analyst

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