

Topic	Subtopic	Comment	Response
Automatic Brightness Control (ABC)		<p>Many stakeholders disagreed with the proposed interim approach to testing models with ABC (testing with ABC disabled and providing a 10% allowance if the model meets the Sensor Validation Test) and commented that EPA should revert to the approach currently employed in the Version 5.3 specification (testing with ABC enabled at 0 and 300 lux and reporting a weighted average of the results. Stakeholders commented that disabling ABC during testing:</p> <ul style="list-style-type: none"> - Will not represent real world use because it is equivalent to a measurement at 300 lux; - Will mislead consumers since the resulting power consumption values would increase dramatically from previous measurements and reports; - Will break harmonization with the values reported under the Federal Trade Commission EnergyGuide program and the California Energy Commission requirements (which rely on the Version 5.3 test method), further confusing consumers; and - May not be possible in the Home Picture Setting on some models. <p>Two stakeholders suggested reverting to the test conditions of Version 5.3, while keeping the proposed Sensor Validation Test. This would permit harmonization with other programs and past data reporting, while ensuring that ABC designs deliver the expected energy savings.</p>	EPA is changing how models with ABC enabled by default are tested. The specification will revert to the current Version 5.3 approach, where products are qualified by measuring On Mode power at 0 lux and 300 lux.
Automatic Brightness Control (ABC)	Allowance Amount	One stakeholder commented that the 10% adder provided to models with ABC when tested with ABC disabled under the interim testing proposal is too generic and may favor larger televisions. The commenter further noted that large TVs are more likely to save more than 10%. Another stakeholder suggested the use of a 20% adder, but stated that measuring On Mode power with ABC enabled (per the Version 5.3 requirements) would be more accurate.	This issue is moot because EPA is changing how models with ABC enabled by default are tested, and will no longer be providing an allowance.
Automatic Brightness Control (ABC)	Sensor Validation	<p>Several stakeholders commented in favor of the Sensor Validation Test proposed in Section 4.3 of the Final Draft specification, intended to demonstrate that a product's ABC sensor reduces power consumption. To pass the test a product must demonstrate a 5% difference between power measurements at 10 and 50 lux, and 50 and 100 lux.</p> <p>One stakeholder further suggested that all power measurements be published on the Qualified Product List, and that another test point be added above 100 lux and that the power measured at this new point be greater than that at 100 lux.</p> <p>Two stakeholders, however, voiced opposition:</p> <ul style="list-style-type: none"> - One noted that small televisions may not be able to meet the 5% difference required by the Sensor Validation Test, thereby discouraging the use of the ABC feature in smaller TVs; - The other commented that EPA should harmonize with a similar requirement proposed for the Version 6.0 Displays specification which requires a 20% difference between 10 and 300 lux. 	The ABC sensor validation testing at 10 lux, 50 lux, and 100 lux has been retained as proposed. A clarification has been added that the On Mode power measured at 300 lux must be greater than or equal to the average On Mode power measured at 100 lux. All power measurements will be published on the Qualified Products List, as indicated in the Draft QPX CB submission form sent to stakeholders for review following the release of the Draft Final. This proposal aligns with most manufacturers' request to maintain the V5.3 approach while also providing the safeguard requested by numerous stakeholders for a means of verifying the savings delivered by ABC.

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Definitions	Mode/Picture Setting Definitions	<p>Two stakeholder commented on the Home and Retail Picture Setting definitions proposed in the final draft, and the need to differentiate between options selected during the Forced Startup Menu and during later use (sometimes termed "scene selections").</p> <p>One of the stakeholders commented that the selections made through the Forced Startup Menu are more than just "Picture Settings" because they can present different menus, eliminate adjustments, enable demo modes, etc. The stakeholder commented that the formerly used terms Home <u>Mode</u> and Retail <u>Mode</u> are more appropriate and proposed the following definitions:</p> <ul style="list-style-type: none"> • <u>Retail Mode</u>: "The forced menu selection intended for the retail environment." • <u>Home Mode</u>: "The forced menu selection intended for the home environment." • <u>Brightest Picture Setting</u>: "The user-selectable preset picture setting in which the TV produces the highest luminance during the On Mode conditions. For a television with a forced menu, this might be the default setting in Retail Mode or a user-selectable preset picture setting in Home Mode." • <u>Home Picture Setting</u>: For televisions without a forced menu, this is the default picture setting. For televisions with a forced menu this is the default picture setting in Home Mode." 	EPA will clarify the requirement to indicate that the default picture setting (the default picture setting in "home" mode for TVs with a forced menu) reflects the settings under which the product qualifies for the ENERGY STAR.
Forced Startup Menu		<p>One stakeholder commented on the proposed requirement that either a second prompt or a warning message appear upon selection of the Retail Picture Setting from the Forced Startup Menu. Under the proposal in the Final Draft specification, the message would warn users that the Home Picture Setting is the setting under which the product qualifies for ENERGY STAR.</p> <p>The stakeholder commented that the requirement should not be either/or but both/and: the TV should require users to both confirm the selection of Retail Picture Setting and warn users that the Home Picture Setting is the setting under which the TV had qualified for ENERGY STAR. The stakeholder also suggested expanding the requirement when a higher power setting is selected, not just Retail and modifying the warning message to inform the user that the non-Home setting will use more power.</p>	EPA will not be proposing any changes to the Forced Menu requirements in the Final Specification (with the exception of the definitional clarifications mentioned above). Maintaining the existing requirements balances the Agency desire to help consumers realize the expected energy savings and the comments received.
Hospitality TVs		One stakeholder commented that EPA should study the energy savings potential of Hospitality TVs in Standby modes and requested the addition of a Section in the specification addressing future considerations such as this one.	There is already a test that measures the daily energy consumption of Hospitality TVs when they are in Standby-active, High Mode. Based on the Energy Star database data, roughly 3% of tested TVs are tested for DAM.

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On Mode Requirements		One stakeholder commended EPA for changing the On Mode power requirements away from a piecewise-linear function with a hard cap for larger screen sizes. However, the commenter noted that the proposed tanh-function requirement also flattens out into a cap, "which disadvantages the most efficient television products."	EPA will retain the On Mode power limits proposed in the Draft 2 Version 6.0 specification.
Picture Settings	Organization	<p>One stakeholder noted that some TVs do not have a Forced Startup Menu feature and instead have a variety of scene options for customers to choose after the initial startup. This stakeholder further suggested that Section 3.2.3 iii (requiring a warning that "Home" is the ENERGY STAR qualified setting any time another picture setting other than Home is selected) be separated from Section 3.2.3 (Forced Startup Menu).</p> <p>A second stakeholder expressed confusion over the applicability of Section 3.2.3 iii.</p>	<p>EPA will clarify the requirement to indicate that the default picture setting (the default picture setting in "home" mode for TVs with a forced menu) reflects the settings under which the product qualifies for the ENERGY STAR .</p> <p>EPA will separate this requirement from Section 3.2.3 "Forced Menu" to limit confusion.</p>
Picture Settings	Warning Message	<p>Several stakeholders suggested removing Section 3.2.3.iii in the Forced Startup Menu requirements or modifying it so that a warning message appears only when a setting that uses more power than Home is selected, in contrast to the Final Draft proposal, which would require the message any time a setting other than Home is selected. The stakeholders noted that the proposed requirement could be confusing for customers if a setting they choose uses less power but a message says that it is not qualified.</p> <p>Other stakeholders commented that any user selection could alter the Picture Setting (e.g., turning off ABC or enabling closed captioning), potentially changing the energy consumption of the TV. Requiring a message every time any setting is changed could give consumers a negative impression of ENERGY STAR and the product. Alternatively, if the requirement is changed such that the message is only displayed when the power increases would require testing power consumption of every possible scene and setting combination, which would be burdensome and would require further study and development of test methods.</p>	<p>As indicated in the letter to Stakeholders distributed on August 10, EPA will clarify the requirement to indicate that the default picture setting (the default picture setting in "home" mode for TVs with a forced menu) reflects the settings under which the product qualifies for the ENERGY STAR. Furthermore, this requirement shall apply to major modes selected from a pre-set menu, and EPA will clarify this in the Final Specification.</p> <p>EPA is interested in the power consumption associated with different picture settings and will examine this issue in a future revision once more data become available.</p>

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Picture Settings	Warning Message Format	<p>One stakeholder requested the language used in the message to either remove the words "ENERGY STAR" or to allow a manufacturer to leave this language in the prompt if their TV does not meet requirements of a revised specification in the future.</p> <p>Two stakeholders suggested that instead of a message prompting a user to respond, the ENERGY STAR logo can be required to be located next to only the "home" setting in the picture setting menu. Another stakeholder suggestion was that if the message was required, then allow a feature for the user to turn off the message as long as the message is enabled by default when the TV is shipped.</p> <p>Another stakeholder suggested that a positive message would be more helpful to consumers. They gave an example that if a television has settings such as "vivid", "cinema", or similar, then the settings that roughly correspond to the "home" setting be indicated as ENERGY STAR qualified as well using the ENERGY STAR logo in the name or the description of the mode.</p>	<p>Apart from the clarifications in definitions indicated in the letter to Stakeholders distributed on August 10, EPA will not be proposing any further changes to the content of the warning message associated with changes to the picture settings in the Final Specification. Maintaining the existing requirements balances the Agency desire to help consumers realize the expected energy savings and the comments received.</p> <p>Similar to how manufacturers need NOT remove ENERGY STAR labels from models that have lost their qualification, but have already sold to customers, manufacturers will not be required to change the content of the message after a model has entered the market.</p>
Standby Requirements	Standby-Passive Mode and Networking	<p>Several stakeholders expressed confusion between Standby-Passive and Standby-Active, Low Mode in Section 3.4 in the Final Draft; specifically, it was unclear whether models shall meet the Standby-Passive Mode requirements while connected to the network.</p> <p>Stakeholders noted that a network-connected Standby-Passive Mode test method is not specified and that the definition of Standby-Passive Mode cannot be switched into another mode with an external signal, so it should not be tested with network connectivity.</p> <p>Lastly, one stakeholder commented that "Standby-Passive Modes" should be added to 4.1.1, which currently only lists test methods for On Mode, Luminance, and DAM.</p>	DOE and EPA will issue a clarification in the Final Version 6.0 specification.
Standby Requirements	Multiple Standby-Passive Modes	One stakeholder requested clarification on which modes must meet the Standby-Passive requirements if a product offers more than one Standby-Passive Mode. For example, will a Standby-Passive Mode with a Mobile High-Definition Link (MHL) be required to meet the requirements?	DOE and EPA will issue a clarification in the Final Version 6.0 specification.
Standby Requirements	Multiple Standby-Active Modes	Another stakeholder commented that the requirement that the Standby-Passive Mode with the lowest power consumption be enabled by default should be extended to other modes, such as Standby-Active, Low Mode.	DOE and EPA will issue a clarification in the Final Version 6.0 specification.

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Standby Requirements	Internet Connectivity	<p>Two stakeholders commented that the energy use of products with internet capability be measured and submitted to EPA as part of the data collection process, with one requesting that the language in the notebox in Section 3.4.3 be preserved for clarity in the Final specification</p> <p>Another stakeholder commented that the measurement of power in Standby-Active, Low Mode with internet connectivity (per Section 4.2) be removed from the specification because it is not required under the DOE NOPR.</p>	<p>EPA will issue further clarity in the Final Version 6.0 specification on measuring the energy use of products with internet capability. This clarification will supplement the guidance in the NOPR, which does not specify testing in Standby-Active, Low Mode.</p> <p>EPA will retain the requirement to measure and submit for qualification the power consumption in Standby-Active, Low Mode with internet connectivity. Given the prevalence of TVs that are being shipped with internet connectivity, EPA is interested in providing the public with information on the power consumption associated with this feature.</p>
Test Method	Standby-Active, Low Mode	One stakeholder agreed with the general networking approach and network connection hierarchy (LAN and not WAN), while another commented that Standby Mode power while connected to the network under alternate settings (such as "Quick Start") be measured and reported.	Quick Start has been seen on a select few network capable TVs and provides power to components so the TV can "boot-up" quicker. If Quick Start is enabled on a TV by default, the energy associated with this feature will be recorded as part of the Standby-active, Low test.
Timeline	Grandfathering	One stakeholder commented that it would be counterproductive to remove the ENERGY STAR label from models that comply with Version 6.0 power consumption requirements but may not meet some of the other requirements that have changed from Version 5.3. The stakeholder commented that such models be permitted to bear the ENERGY STAR mark for an additional period of time through the use of a different effective date for non-power requirements.	EPA requires that only newly manufactured products that meet the latest ES requirements can be labeled. EPA does not require that products that are in the market when the spec changes have their labels removed if they do not meet the latest requirements.
Timeline	DOE Final Rule	<p>Several stakeholders expressed concern about how a DOE final rule would affect qualification under Version 6.0. One stakeholder requested that EPA clarify what would happen under three scenarios:</p> <ol style="list-style-type: none"> 1. If DOE's test method is effective prior to Version 6.0; 2. If the two become effective concurrently; and 3. If DOE's method becomes effective after Version 6.0. <p>Another stakeholder requested that EPA avoid retesting of models following the finalization of the test method.</p>	<p>Once the DOE test procedure final rule is published, EPA will evaluate its impact on the qualification rate to determine the appropriate transition time to using this final test procedure to qualify products with ABC enabled by default. DOE and EPA will work with manufacturers to make this transition smoothly. Note, if DOE adopts a final test procedure before Version 6.0 becomes effective, EPA intends to make this assessment quickly, and communicate a timeframe for transitioning to the DOE test procedure to stakeholders.</p> <p>EPA has previously indicated that products tested to the provisional approach will not need to be retested.</p>

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Timeline	Effective Date	<p>Two stakeholders commented that it would be beneficial for the specification to come into effect in Spring 2013 to align with the design/manufacturing cycles for new TVs introduced in 2013. One of these stakeholder further encouraged EPA to finalize the specification as soon as possible.</p> <p>On the other hand, one stakeholder recommended that EPA wait until the DOE NOPR is finalized before releasing Version 6.0, while another commented that software specifications have already been submitted for 2013 models, and that the new warning requirement for picture settings other than "Home" cannot be easily accommodated.</p>	EPA will finalize the specification by the end of August or early September, such that the Version 6.0 specification can recognize efficient models released in Spring 2013.
Toxicity/ Recyclability	Toxicity	One stakeholder commented on the removal of toxicity and recyclability requirements from the specification to the Partner Commitments, stating that ENERGY STAR should be limited to energy efficiency in order to avoid confusing the brand and duplicating other efforts.	EPA will retain the reference to the toxicity and recyclability requirements in the Partner Commitments, as proposed in Final Draft documents.