

August 21st, 2012

Ms. Verena Radulovic
Product Labeling
ENERGY STAR Program
U.S. Environmental Protection Agency
Via e-mail: displays@energystar.gov

Re: Panasonic Comments on ENERGY STAR Displays Version 6.0 Final Draft Specification

As a manufacturer and marketer of all television and professional display technologies, Panasonic appreciates the opportunity to review and comment on the ENERGY STAR Displays Version 6.0 Final Draft Specification. Panasonic continues to be a strong supporter of the ENERGY STAR brand and its program objectives; thus we are offering these additional comments for your consideration.

In reading your August 7th, 2012 letter describing various changes to the Final Draft Specification, it was unclear whether certain comments from our June 29th, 2012 letter had been accepted. We have replicated them below in order to ensure consideration of these important issues.

Test Conduct:

The Test Method Section 6.1)A) Testing at Factory Default Settings requires power measurements performed with the product in its as-shipped condition except as otherwise specified by the Test Method. Regarding the measurement of the On Mode and Sleep Mode power of signage displays, we believe the data and network capabilities should remain in their as-shipped condition.

Signage displays are designed and marketed for professional applications as opposed to consumer use. The factory defaults are implemented to match the usage requirements of the majority of these professional installations. Consequently, Panasonic agrees that signage displays should be tested in their as-shipped condition. However, we do not recommend these signage displays be taken out of their default condition in order to enable data or network capabilities during On Mode or Sleep Mode power measurements.

The Summary and Response to Stakeholder Comments (Draft 4 Version 6.0 ENERGY STAR Displays Test Method Comment Summary.pdf) states at the bottom of page 3; "If the occupancy sensor is disabled by default, the power of the Sleep Mode shall be measured only with the sensor disabled." Panasonic recommends that for signage displays, the data and network capabilities should remain throughout the On Mode and Sleep Mode testing in their default as-shipped condition in the same manner that an occupancy sensor is treated.

Automatic Brightness Control Power Allowance:

The Eligibility Criteria includes an Equation 5 which determines a 10% On Mode Power Allowance for products with ABC enabled by default. In order to qualify for this power allowance, the measured On Mode power reduction must be at least 20%.

Panasonic recommends that the On Mode Power Allowance should also be 20%. The current benefit for ABC enabled products of only 10% appears to be too little to promote the inclusion of this power saving feature in display products.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with EPA has provided a valuable service to consumers, helping them to make better informed choices about their purchases of energy efficient products. Our comments on the Displays Final Draft are intended to improve its application to this important product category.

Again, Panasonic appreciates the opportunity to comment on the ENERGY STAR Program and welcomes the opportunity to further discuss our views with you.

Sincerely,

Mark J. Sharp
Group Manager
Panasonic Corporation of North America

cc: kent.christopher@epa.gov
nruiz@icfi.com
bzhumagali@icfi.com
Joshua.Forgotson@icfi.com
Ashley.Armstrong@ee.doe.gov