



*Via e-mail:  
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May 31, 2012

United States Environmental Protection Agency  
Office of Air and Radiation  
Washington, D.C. 20460

Subject: **ENERGY STAR Version 6.0 Specification for Televisions – ABC proposal**

**COMMENTS OF  
SHARP LABS OF AMERICA**

SHARP is an enthusiastic ENERGY STAR Partner and is committed to building high-efficiency, environmentally advanced products that deliver top performance to our customers. The ENERGY STAR program continues to be the most effective approach for SHARP to communicate the low power consumption of our products to retailers and consumers.

On May 16th, EPA released a new ABC proposal for Version 6.0 ENERGY STAR Specification for TVs.

SHARP offers the following comments:

**The DOE NOPR was ill timed**

As Technical Area Manager of IEC TC100's Energy Efficiency Technical Area and as co-chair of CEA's R4 WG13 in development of the update to CEA-2037, I continue to be

personally disappointed with the timing of the DOE NOPR. The NOPR was introduced just as both IEC and CEA were in active development of new standards that would improve the measurement of ABC. CEA and its members spent time and money collecting ABC data, and once the data collection was complete – and before standards were written – DOE issued the NOPR, effectively preempting consensus-driven standards work. The DOE should have waited for the standards cycles to have completed their work and could then adopt those standards. Such an approach would have allowed international harmonization and would have avoided the current confusion and uncertainty.

SHARP is sympathetic that this uncertainty also affects EPA's efforts to update the ENERGY STAR program for TVs.

#### **Parts of the DOE NOPR are inappropriate**

Data from CEA, CLASP, and DOE demonstrate that the ABC values of 10, 50, 100, and 300 lux proposed in the NOPR are inappropriate for modeling US households. As presented in various comments, values of 0, 12, 35, and 300 would better reflect the savings offered by ABC. Comments to DOE indicate that many other changes to the NOPR might also be required.

Based on these comments, it is clear that the test procedure in the DOE NOPR should not be assumed to be the final rule.

#### **The proposed 10% ABC adder does not solve the problem**

Currently, we have an internationally standardized procedure that tests ABC at 0 and 300 lux. It is known that some products take advantage of the procedure and implement ABC in a way that reduces measured power consumption but does not necessarily deliver those savings to consumers. CEA, IEC, DOE and others are working to improve ABC modeling with new procedures.

Unfortunately, the ABC proposal from EPA, while simple, does not solve the problem. A manufacturer with a poor ABC implementation would receive the same benefit as a manufacturer with an ideal implementation.

**The proposed 10% ABC adder goes against accurate modeling goals**

During the development of IEC 62087 Ed. 2.0, which began in 2006, EPA was very clear that the goal was to model actual energy use in the home. Though some television sets ABC implementations exploit current ABC measurement method, not all do. Unfortunately, eliminating measurement by introducing a 10% adder for ABC takes us further from a model of actual use.

Note that the CEA data shows a significant number of hours viewed near 0 lux. This indicates that the current measurement at 0 lux continues to have merit.

**The proposed 10% ABC adder should not be adopted**

This new ABC proposal will have an extremely short life – if any at all. At the DOE meeting on March 22, 2012, DOE stated that their target date for the release of the Report and Order is September, 2012. That could lead to mandatory adoption by March 2013.

EPA should continue with the current procedure of ABC measurement at 0 and 300 lux for the current time. Introducing a new ABC rule that is at odds with IEC 62087 Ed. 3.0 and CEA-2037, does not solve the ABC problem, does not improve modeling, and will have a very short life (if any) doesn't make sense.

The proposed 10% ABC adder should not be adopted. The current measurement method should be retained at this time.

### **The real problem is uncertainty**

The DOE NOPR has introduced uncertainty for standards developers, manufacturers, and EPA. The ABC proposal does nothing to reduce this uncertainty.

No matter what procedure is used, manufacturers are faced with making products to a target set in July 2012 that is likely to be upended in March 2013. Model year 2013 products are being designed today that could be released as early as January. These products might include the ENERGY STAR logo at launch only to need re-testing and possible re-designs to keep the logo. Otherwise, those products might need running changes to remove ENERGY STAR logos in on-screen-displays, and on product, packaging, logos, and sales materials.

This situation could make manufacturers decide not to pursue ENERGY STAR certification for products that would otherwise qualify. Currently, that is the only path currently available where manufacturers are guaranteed certainty.

### **The solution is a policy exception**

Rather than look to a new test procedure, EPA should look at the area that it truly controls: policy. If EPA is willing to make a short-term policy exception, certainty for manufacturers can be restored.

One possible exception would allow grandfathering of products that are certified to meet ENERGY STAR v6.0 energy limits before the DOE test procedure goes into effect. The grandfathering allowance would expire on April 2014. This would provide certainty for 2013 model year products that are introduced early in the calendar year. Models certified after the DOE rules become effective would not be subject to the grandfathering exception as such models would have no choice but to follow DOE rules.

## **Conclusion**

SHARP strongly supports the Energy Star program and believes that it is best served by

- avoiding a short-term change to the test procedure that conflicts with current standards, and
- by providing certainty through a temporary policy exception, such as limited grandfathering as we approach the DOE-forced transition.

We hope that EPA strongly considers SHARPs comments as we strive for an effective, accurate, and efficient next version of the Energy Star program for televisions.

Respectfully submitted,

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May 31, 2012