

Draft 2 Version 6.0 Televisions Specification Comments and Responses on On Mode Power
May 16, 2012

This document is intended to summarize comments submitted by stakeholders on On Mode power in response to the Draft 2 Version 6.0 Televisions (TVs) specification.

Ref. No.	Topic	Comment	EPA Response
1	On Mode Power	We strongly support both the approach and on model power limits EPA proposed in its ENERGY STAR Version 6.0 – Draft 2 eligibility criteria for new televisions.	EPA continues to propose the On Mode power limits proposed in the Draft 2 Version 6.0 specification.
2	On Mode Power	The use of a curve whereby efficiency requirements increase as a function of screen area is sound policy. It allows very large TVs to qualify for ENERGY STAR and provides additional power budget as screen size increases. This proposal will help limit the category's overall energy use as consumers and businesses switch to larger TVs due to their increased availability, quality and rapidly decreasing pricing.	
3	On Mode Power	As of early 2012, EPA shows a qualification rate of 15% for models that would meet the proposed on mode power limits. We think this level of stringency is appropriate as the current data base does not include many of the 2012 models that will be introduced to the market this year. Per the exhibits at the January 2012 Consumer Electronic Show many of these new models will provide 15 to 40% energy savings compared to the 2011 models. As a result we expect the qualification rate for Version 6.0 to be considerably higher than 15% and perhaps >25% (EPA's typical qualification rate) once the specification goes into effect in early 2013.	

4	On Mode Power	We commend EPA for its approach in developing On Mode Power requirements and believe that the 15% qualifying rate properly accounts for natural market adoption of efficient models between now and Version 6's effective date in early 2013.	EPA continues to propose the On Mode power limits proposed in the Draft 2 Version 6.0 specification.
5	On Mode Power	We believe that this approach strikes the right balance by maintaining the spirit of the Version 5 cap beyond while still allowing larger efficient TVs to qualify for ENERGY STAR.	
6	On Mode Power	The Draft 2 Version 6.0 specification would in effect create a requirement that can be met by only a single technology for large screens, based on products currently available on the market. The Draft 2 dataset shows that for TVs larger than 46-inches, all qualifying sets are LED backlit technology with the exception of a single DLP set. It is misleading for the EPA to suggest that multiple TV technologies can achieve ENERGY STAR when in fact only LED-backlit LCD TVs qualify in larger sizes.	In establishing the proposed performance levels, EPA re-evaluated its data associated with nearly 1700 current and previously ENERGY STAR qualified television models that stakeholders indicated are reasonably reflective of the current TV market. The proposed requirements represent the current top 15% of TV models in the EPA dataset. Based on this data set, EPA has proposed 2013 performance levels intended to differentiate top performers while allowing for good selection of products across all screen sizes available at a cost effective price. A preview of 2012 models at the recent Consumer Electronics Show demonstrated further efficiencies in forthcoming models. In addition, LED-backlit screens are becoming the most prevalent screen type in the marketplace, reflecting an overall trend in LED-backlit products.

7	On Mode Power	Further, the proposed On-mode power limits in Draft 2 Version 6.0 do not address the uneven playing field fostered by a technology-biased specification. Although the proposed power limits no longer have a hard cap, significantly less power is afforded to larger screens on an area basis.	The ENERGY STAR specification is technology neutral. The program draws on a robust data set to propose On Mode power limits that continue to allow for good qualification of TV models. Consistent with the qualification rate for the overall dataset, EPA has proposed limits that would also allow for qualification of approximately 15% of models over 60 inches in diagonal screen size, including a 70 inch model that continues to be able to meet the proposed Version 6.0 On Mode power limits.
8	On Mode Power	Consequently, consumers looking for information on energy efficient choices in the larger size TVs will be directed toward a single technology. We strongly believe this is contrary to ENERGY STAR's objectives and will ultimately diminish consumer acceptance and manufacturer support for the program.	
9	On Mode Power	We commend the EPA for recognizing that a straight line calculation with a hard cap is not an appropriate calculation and for using a TanH equation. However, we must also caution that even the proposed TanH based curve flattens out into a cap, which disproportionately disadvantages the most efficient television products.	