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March 2, 2012

Ms. Verena Radulovic  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
1310 L Street, NW  
Washington, DC 20005

Subject: Draft 2 Version 6.0 ENERGY STAR Program Requirements for Televisions

Dear Ms. Radulovic:

On behalf of the Consumer Electronics Association (CEA), thank you for the opportunity to comment on the Draft 2 Version 6.0 ENERGY STAR Televisions specification. The draft proposals are outlined in a memo from the EPA dated February 3, 2012.

As a long-time partner in energy efficiency, the consumer electronics industry is committed to the further success of the ENERGY STAR program, of which televisions are an excellent example. The industry's past efforts to maintain ENERGY STAR program success has included a CEA proposal to accelerate discussions on earlier versions of the specification, as well as comments and contributions to specific criteria. We offer the following comments with regard to the test method, non-energy attributes, and the proposed effective date of the Version 6.0 ENERGY STAR TV specification.

**Test Method:**

The EPA anticipates adopting the television test procedure currently under development by the U.S. Department of Energy (DOE). The DOE TV Test Procedure Notice of Proposed Rulemaking (NPR) was only recently released for public review and comment. Stakeholder feedback has not yet been collected, and indeed the DOE has not even held its first stakeholder meeting to more fully describe their proposed test procedure and to solicit stakeholder feedback on key issues. EPA's proposal to incorporate the proposed DOE test procedure is premature and inappropriate given its status. While we recognize that the DOE's timeline for production of a test procedure does not align with the EPA's goals to publish Version 6.0 by March 2012, the only logical solution is for the EPA to continue to track and participate in the DOE process and, only after the DOE has completed its work, seek to incorporate a final DOE test procedure in the ENERGY STAR TV specification.

In addition to the ongoing and interrelated activity at the DOE, the EPA is well aware of other stakeholder activities relevant to a revised ENERGY STAR TV specification. More specifically, in July 2011, the EPA issued a memo recognizing the work by CEA to collect and analyze critical data intended to better categorize the energy savings benefits of the Automatic Brightness Control (ABC) feature. CEA has expended considerable time and resources in collecting measured illuminance at more locations and for more TVs than any other study in the world. This data is currently under review, and not yet finalized. It makes little sense for the EPA to proceed at this moment with the Version 6.0 development process without benefit of this recently collected data and the final report. Further, EPA is aware that CEA is in the process of revising the industry's consensus standard,

ANSI/CEA-2037, *Determination of Television Average Power Consumption*. This standard is fundamental to efforts to test energy consumption of televisions in the U.S. and North American markets.

Finally, the EPA is equally aware that the International Electrotechnical Commission (IEC) is currently working on a revision to IEC 62087, *Methods of Measurement for the Power Consumption of Audio, Video and Related Equipment*. The new IEC 62087 Ed. 4.0 document, like the CEA standard, will be critical to the development of a harmonized Version 6.0 of the television specification.

**Toxicity and Recyclability Requirements:**

As CEA has noted in past ENERGY STAR specification development processes, as well as in recent comments regarding the EPA's proposed vision and guiding principles for ENERGY STAR, we do not support the inclusion of non-energy-related criteria in ENERGY STAR specifications, including the EPA's proposed toxicity and recyclability requirements for the ENERGY STAR TV specification. We are not aware of any evidence linking energy efficiency to toxicity levels or recyclability, nor are we aware of any evidence that consumers look to the ENERGY STAR brand as a mark of favorable lifecycle qualities. As industry partners in the ENERGY STAR program, we strongly urge EPA to keep the ENERGY STAR program's focus on energy efficiency, and delete Section 3.8 from Draft 2 Version 6.0 of the TV specification.

Moreover, EPA's proposed inclusion of a requirement related to the European Union's Restriction on Hazardous Substances (RoHS) Directive also does not align with the RoHS requirement itself. The Draft 2 Version 6.0 TV specification lists four exemptions for components in televisions, but these exemptions represent only a small fraction of the exemptions specified in the RoHS Directive. As emphasized above, we strongly urge that Section 3.8 of the Draft 2 Version 6.0 be removed altogether. However, if the final specification references RoHS in any way, it should include a complete reference to all RoHS exemptions.

**Effective Date:**

In the past, CEA has requested that new television specification effective dates be carefully timed to the industry's production and sales cycles. EPA currently anticipates a Version 6.0 specification effective date in early 2013.

We know that for a large number of TV manufacturers, springtime is the start of the one year cycle in the production of a particular model. This is the start of the product introduction cycle and, therefore, the natural transition of models. Accordingly, we urge the EPA to schedule the effective date of the final Version 6.0 specification in the spring, and to finalize the specification at least nine months prior to its effective date.



In conclusion, CEA reiterates its strong support for the ENERGY STAR program and urges EPA to favorably consider the above requests and suggested changes to the latest draft TV specification in order to maintain the program's relevancy in the TV category. We urge the EPA to coordinate timing of the Version 6.0 specification development with the ongoing, related activities at DOE and CEA. We also urge the removal of Section 3.8, which is unrelated to energy consumption, and we recommend that the effective date of the final specification be aligned appropriately with industry production cycles.

**Ms. Verena Radulovic**

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As always, please do not hesitate to contact us if you have any questions or need more information.

Sincerely,

/s/

Bill Belt

Senior Director, Technology & Standards

/s/

Douglas Johnson

Vice President, Technology Policy

Cc: Katharine Kaplan, EPA  
Owen Sanford, ICF International