

May 31, 2012

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

Re: Panasonic Comments on ENERGY STAR Version 6.0 Televisions ABC Proposal:

Panasonic appreciates the opportunity to comment on the ENERGY STAR Version 6.0 TVs ABC Proposal. As a leading manufacturer and marketer of all television technologies, Panasonic is a strong supporter of the ENERGY STAR brand and its program objectives, which have been exemplified in the current lineup of our most efficient TV models ever.

Provisional Maximum On Mode Power with ABC Enabled by Default:

The ENERGY STAR Proposal for Addressing ABC in the Version 6.0 ENERGY STAR Televisions Specification includes the following:

Provisional Calculation of Maximum On Mode Power for Products with ABC Enabled by Default:

$$P_{ON_MAX_ABC} = 1.1 * P_{ON_MAX}$$

We understand that ENERGY STAR is proposing a fixed 10% adder to the On Mode power for TVs with ABC enabled by default. This will be in effect until the DOE releases their TV Test Method which will specify details on measuring On Mode power with ABC enabled.

However, after careful review of the 2012 Panasonic ENERGY STAR V5.3 qualified TVs (including LCD and Plasma), we find more than a 20% average difference in the On Mode power with and without ABC. Panasonic recommends that the On Mode power adder be 20% rather than the proposed 10%. This will more accurately reflect the power difference attributed to the ABC feature in our products currently in the market.

Timing of the Version 6.0 Provisional Requirement for Qualification:

The ENERGY STAR TVs ABC Proposal states that products that qualify to the Version 6.0 Televisions specification under this provisional requirement will not need to be retested once the DOE final test procedure for televisions is adopted. Panasonic welcomes this consideration since it would be overly burdensome to submit the product for requalification under the new DOE criteria which is yet to be determined.

Panasonic and many TV manufacturers will have completed the design, early production, and test of most of their new 2013 models by the end of 2012. Panasonic plans to submit 2013 models for ENERGY STAR qualification starting in November of 2012. It would be burdensome to qualify to Version 5.3 in November 2012 and then be required to qualify the same models in April 2013 for Version 6.0.

Panasonic requests that models submitted starting in November 2012 be allowed to qualify for Version 6.0 immediately. This will eliminate the double-qualification of models for both Versions 5.3 and 6.0.

If this request is for some reason deemed unworkable, then a fallback solution would be for the EPA to provide the necessary guidance to the testing laboratories to enable them to test for both Versions 5.3 and 6.0 simultaneously starting in November 2012.

Timing of the DOE TV Test Procedure Requirement for Qualification:

We understand that the DOE TV Test Procedure publication date is uncertain. This is problematic for manufacturers because they are required to design TVs to satisfy three different ENERGY STAR requirements (Version 5.3, 6.0 Step 1, and 6.0 Step 2) while the last requirement is unknown.

If the DOE publishes the TV Test Procedure prior to April 2013, Panasonic recommends delaying the effective date of ENERGY STAR TVs Version 6.0 Step 2 by six months to October 2013.

If the DOE publishes the TV Test Procedure after April 2013, Panasonic recommends that there be a minimum six month grace period before such requirements are implemented by ENERGY STAR. The reason is that product performance including ABC functionality is generally designed at least six months prior to final production. The typical nine month lead-time which ENERGY STAR tries to maintain before implementing new requirement specifications recognizes this.

If a minimum six month lead time for Version 6.0 Step 2 is not granted, it may force various models to lose their ENERGY STAR qualification in the course of the 2013 model year if they have not already qualified under Version 6.0 Step 1. The resulting confusion in the marketplace could be avoided by allowing adequate time for manufacturers to make the necessary design changes and associated testing and qualification.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with the EPA has provided consumers a valuable tool by which they can make better informed choices about their purchases of energy efficient products.

As always, 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: Bizhan Zhumagali
Owen Sanford