



Via e-mail:
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United States Environmental Protection Agency
Office of Air and Radiation
Washington, D.C. 20460

Subject: **ENERGY STAR Draft 3 Version 6.0 Specification for Displays**

**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 February 10th, EPA released Draft 3 of the Version 6.0 ENERGY STAR Specification for Displays. EPA delivered an update on March 6th.

SHARP offers the following comments:

Size vs. Power

SHARP's main concern is with the size limit. We understand that EPA has limited information about larger screen sizes, but this should not disqualify all displays 61 inches and above. Though SHARP is not keen on a power level cap, we strongly prefer it to a size cap.

By limiting power but not size, the Energy Star brand will continue to save power for end buyers. As an example, if a customer specified a 240-inch diagonal video wall, it could be built with sixteen 60-inch displays or only nine 80-inch displays. If all the displays consumed 400W, the 60-inch solution would require 6,400W for the 240-inch video wall while the 80-inch solution would require 3,600W. This savings of 2,800W should be encouraged by Energy Star. In short, larger displays can save power in video wall applications and should not be excluded from the Energy Star program. EPA should limit power, not size.

Additionally, an energy cap, rather than size cap, would encourage manufacturers to prioritize energy efficiency for displays over 60 inches. Large, qualifying models would be entered into the Energy Star database, ensuring that EPA will receive data on large displays as screen sizes inevitably grow.

Scope

SHARP notes that professional displays have very different use cases than monitors. Recently, monitors have been increasing in size to the point that they can overlap with the size range of professional signage products. However, the use cases are very different. Monitors for personal use at close distances can be used at relatively dim levels. Professional signage displays installed in bright retail environments and outdoors must be able to deliver very bright images. Because of the difference in viewing distance, professional signage displays often have lower

resolution requirements than computer monitors. Standby requirements are also very different for monitors and professional signage displays.

In the future, the displays specification should be broken in to separate documents to ensure that each use case is evaluated separately so that the evaluation of each product category is not compromised.

Standby

Professional signage displays generally do not go into a sleep mode automatically. They generally need to go into a Standby-active, low mode which must provide enough power to detect an external signal. Note that televisions generally go into a less consumptive Standby-passive mode and are allowed 1W, yet the Displays specification only allows 0.5W. While 0.5W may be adequate for a computer monitor, it is not adequate for professional signage displays. Professional signage displays should be allotted 2W to allow Standby-active, low implementations as required by the signage display marketplace.

Toxicity

SHARP prefers that EPA not include toxicity requirements in the product specifications, especially since no link is established between higher energy efficiency and higher toxicity.

SHARP also notes that the toxicity requirements as worded do not include all of the RoHS exemptions. This includes mercury. CCFL-backlit LCD TVs would not qualify under Draft 2. EPA should not remove any RoHS exemptions, including cadmium.

Conclusion

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

- limiting power, not size,
- a dedicated document specifying requirements for professional signage displays, and

- not implementing toxicity requirements (and certainly not by removing the full list of RoHS exemptions, including mercury and cadmium),

We hope that EPA strongly considers SHARPs comments as we work together to create an effective, accurate, and efficient next version of the Energy Star program for displays.

Respectfully submitted,

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