



Consumer Electronics Association

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Submitted Via email to: televisions@energystar.gov

Ms. Verena Radulovic
Product Manager, ENERGY STAR for Consumer Electronics
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, DC 20460

Re: CEA Opposition to Final Draft Version 6.0 ENERGY STAR TVs Specification

Dear Ms. Radulovic:

On behalf of the Consumer Electronics Association (CEA)[®], we are writing to provide **comments in opposition** of the Final Draft Version 6.0 ENERGY STAR TVs Specification and strongly encourage ENERGY STAR to maintain the testing procedures found in Version 5.3.

CEA represents more than 2,000 companies involved in the design, development, manufacturing, distribution and integration of audio, video, in-vehicle electronics, wireless and landline communications, information technology, home networking, multimedia and accessory products, as well as related services that are sold through consumer channels. Our specific comments on the Final Draft Version 6.0 ENERGY STAR TVs Specification are as follows:

I. CEA Opposes ENERGY STAR Moving Forward Before the Related DOE NOPR is Finalized

CEA recommends that ENERGY STAR use the proposed luminances in the U.S. Department of Energy (DOE) Notice of Proposed Rulemaking (NOPR) Test Procedure for Television Sets. As you know, the Energy Policy and Conservation Act (EPCA) requires usage of the final DOE test procedures by the Federal Trade Commission and requires utilization or reference by ENERGY STAR and the California Energy Commission:

DOE NOPR: Energy Conservation Program: Test Procedure for Television Sets

"Furthermore, EPCA requires the Federal Trade Commission (FTC) to prescribe labeling rules for certain covered products including TVs. (42 U.S.C. 6294(a)(2)(I)) Hence, the final DOE test procedure is required to be utilized by the FTC for labeling requirements and shall be utilized or referenced by other organizations, such as the EPA for its ENERGY STAR specification for TVs. This test procedure must also be referenced by the CEC in California and any other state regulation providing for the disclosure of information with respect to any measure of TV energy consumption once the test procedure becomes effective 30 days after the test procedure final rule publication...." - *Excerpt from DOE NOPR page 2833 (second column, last paragraph)*

As such, to avoid the significant costs associated with changing to the proposed Version 6.0 measurements now and then changing again in only a few months to reflect the new DOE test procedure, CEA strongly recommends that EPA wait until the DOE NOPR is finished and utilize the final DOE test procedure.

II. CEA Recommends Using Version 5.3 ENERGY STAR Automatic Brightness Control (ABC) and Opposes the Proposed Version 6.0 Approach for Products with ABC

EPA's proposed methodology for measuring power under the Final Draft Version 6.0 of ENERGY STAR requires a measurement with Automatic Brightness Control (ABC) disabled – which is equivalent to a measurement at 300 lux – and does not represent real world usage. Consequently, this could have a negative impact on consumers or mislead consumers into thinking that TV energy efficiency has decreased. The current method under Version 5.3 ENERGY STAR uses a weighted average of measurements at 0 and 300 lux and is a far more accurate representation of actual usage. The following supporting data are from CEA and the Collaborative Labeling & Appliance Standards Program (CLASP):

- About 1/8th of TV viewing is done at 0 to 1 lux (11.6% according to CEA data and 13.1% according to CLASP data).
- 25% of viewing is done in dark conditions (Under 7.1 lux according to CEA data and under 4.6 lux according to CLASP data).
- According to CEA data, 50% of viewing is under 14.0 lux. CLASP data shows 50% of viewing is under 15.1 lux.
- According to CEA data, only 2.5% of viewing occurs at 300 lux or greater. The CLASP data shows that 1.9% of viewing occurs at 300 lux or greater.

CEA strongly maintains that the 0 lux measurement point is a reasonable, representative measurement condition. It is balanced by the worst case measurement condition of 300 lux. Accuracy and repeatability of additional measurement points become questionable. CEA remains hopeful that the upcoming DOE NOPR will further improve the accuracy of the measurement in modeling real world television power consumption, and strongly encourages ENERGY STAR to maintain the Version 5.3 ENERGY STAR weighted average of measurements from 0 and 300 lux. Lastly, maintaining the average measurements from Version 5.3 would minimize delays in finalizing the draft of Version 6.0 and afford EPA the opportunity to hold to its schedule.

III. CEA Recommends EPA Harmonize the ABC Approach With Important Existing Federal Programs Such as EnergyGuide and Other Programs

If ENERGY STAR changes its approach toward Automatic Brightness Control as proposed in Version 6.0, the resulting numbers will no longer correlate with the Federal Trade Commission (FTC) EnergyGuide program, nor the California Energy Commission program. Further, Version 6.0 would be rendered incompatible with the IEC standard. If ENERGY STAR were to proceed with the approach under Version 6.0, industry would be required to disable ABC and report that number; if the ABC is shown to have adequate performance, by validating that the power must increase by 5 percent, it will be eligible for a 10 percent adder. The end result will be significantly problematic for the entire TV industry, as the reported numbers for TVs with ABC will increase dramatically. This increase could be misinterpreted and misconstrued to show that TVs have a larger share of residential energy use than their actual use. This issue is independent of whether the 10 percent adder for ABC is adequate

for any particular model – it affects all ABC TVs. Additionally, manufacturers will have to test twice, first according to FTC for EnergyGuide labeling, and second for Version 6.0 qualification. This adds undue burden on manufacturers that would like their TVs ENERGY STAR qualified to Version 6.0. It is imperative that the FTC, CEC and ENERGY STAR programs do not become divorced from each other and result in disparate sets of data; therefore, CEA strongly recommends that ENERGY STAR maintain the ABC approach used under Version 5.3.

Thank you for the opportunity to provide these comments on ENERGY STAR Version 6.0. If you would like to discuss our comments further please do not hesitate to contact Doug Johnson at (703) 907-7686 or djohnson@ce.org, or Allison Schumacher at 703-907-7631 or aschumacher@ce.org.

Sincerely,
THE CONSUMER ELECTRONICS ASSOCIATION

/s/
Allison Schumacher
Senior Manager, Environmental Policy and Sustainability

/s/
Douglas Johnson
Vice President, Technology Policy