

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

December 17, 2014

Ms. Verena Radulovic
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: ENERGY STAR Specification for Televisions, Version 7.0 Final Draft

Dear Ms. Radulovic:

On December 3, 2014, the U.S. Environmental Protection Agency (EPA) distributed the final draft of its ENERGY STAR version 7.0 specification for televisions (final draft). This letter is written in response to the draft specification and is submitted on behalf of the Appliance Standards Awareness Project (ASAP), and the American Council for an Energy-Efficient Economy (ACEEE).

We commend EPA for commencing this important revision process and for its receptiveness to, and consideration of, stakeholder comments. Generally speaking, we support the contents of the final draft. The on-mode requirement will help highlight the most efficient televisions on the market and the ultra-high definition (UHD) allowance will provide an initial entry point for a technology that could begin to dominate the U.S. market in the near future.¹ We also fully support the September 30, 2015, effective date.

Despite our overall support, we do have some concerns with the final draft. Removing the expiration date for the UHD allowance removes a date certain from which EPA and stakeholders could work toward to analyze and revisit UHD prevalence and energy consumption. Numerous UHD TV models, from major manufacturers, *already* meet the allowance and several models are very close to meeting the allowance. Similar to the experience of version 6, the lack of an expiration date could quickly render version 7 meaningless in regards to distinguishing the efficient models if there is a rapid influx of UHD televisions that meet the allowance and qualify as ENERGY STAR. Because of this, we continue to urge EPA to include an expiration date for the UHD allowance. Preferably December 31, 2016.

In the absence of an expiration date, the emphasis is placed on the timely development of version 8. In the cover letter that accompanied the final draft, EPA states that it will “. . . watch the market closely and adjust the allowance when appropriate to ensure the ENERGY STAR continues to recognize the top performing products with ultra-high resolution.” We strongly encourage EPA to do this and believe that given past market shifts in this product category, EPA should plan toward an effective date no later than January 1, 2018, for version 8 and schedule a version 7 specification revision launch accordingly.

Furthermore, we continue to believe that any TV should be able to maintain a power level of 3W or less in standby-active low, regardless of whether features such as Quick Start are enabled by default, selected during the initial set up, or activated at a later time. Concerns also remain with regard to the frequency and duration that a TV is in standby-active high mode. EPA continues only to require that the TV return to standby-active low within 15 minutes of completing downloads. We urge EPA to investigate the

¹ See <http://www.cnet.com/news/4k-tv-shipments-soar-to-6-4m-in-2014/>

energy consumption associated with these features, through required reporting in the QPX Template, in preparation for the next specification revision.

Thank you for considering these comments. We look forward to working with EPA on future specifications for televisions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anthony Fryer".

Anthony Fryer, Senior Analyst
Appliance Standards Awareness Project

A handwritten signature in cursive script, appearing to read "Sameer Kwatra".

Sameer Kwatra, Senior Analyst
American Council for an Energy-Efficient Economy