

PLASMA DISPLAY COALITION

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Consumer Electronics Retailers Coalition



December 7, 2007

Ms. Katharine Kaplan
Product Manager, CE and IT
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
MC 6202J
Washington, DC 20460

Re: Revised On Mode Proposal for Version 3.0 ENERGY STAR TV Product Specification

Dear Katharine:

The Plasma Display Coalition (PDC) appreciated the opportunity to discuss the revised On Mode proposed specification during the Stakeholders conference call on November 28, 2007.

For background, the founding members of the PDC – Hitachi Home Electronics, LG Electronics, Pioneer Electronics and Panasonic Corporation of North America – are among the world's best known, most respected manufacturers and marketers of high-quality televisions. The PDC and its members are supportive of the Energy Star program objectives and agree that our industry has an important role in supporting and encouraging energy conservation.

As leaders in the U.S. TV industry, PDC members, and retailers represented by the Consumer Electronics Retailers Coalition (CERC), have a substantial interest in the success of the Version 3.0 Energy Star TV specification the EPA plans to introduce to U.S. consumers in late 2008. The PDC and CERC believe it is in the best interest of American consumers that the Energy Star logo continues to represent an important informational message with the logo standing for energy efficient products without sacrifice in product performance.

The purpose of this reply is to provide the EPA with our comment to the revised On Mode proposal received on November 26, 2007.

In reviewing the Revised On Mode Specification received on November 26th, we were pleased to find that this proposed implementation does address some of our key points and concerns:

1. Consumers will be able to consider an efficient model within a best-in-class approach among larger screen size;
2. The revised data set better reflects higher performance models and features generally found on larger screen sizes and also minimizes those categories that are in decline;
3. This revised specification is generally in keeping with the EPA desire “of pursuing energy efficiency without sacrificing high performance”;
4. The new revised specification and new data set provide a more balanced approach in establishing specifications for the On Mode ENERGY STAR specification.

For the reasons described above, PDC members and the CERC can support the revised On Mode proposed specification as revised November 26, 2007. We believe the revised approach will be more successful in the market place for consumers, retailers and manufacturers than the original proposal in Draft 2. However, PDC members and the CERC still believe that EPA’s Draft 3 specification should recognize four distinct categories, CRT, micro-display, LCD and Plasma.

Additionally, through several discussions, formal replies and meetings during the development of the draft Version 3.0 specification, the PDC and the CERC have consistently conveyed several comments and recommendations regarding the On Mode specification in Draft 2. As noted:

1. Draft 2 favored less attractive technologies with declining market share and smaller screen sizes. The revised On Mode proposal lessens but does not eliminate this disparity.
2. The Draft 2 specification did not acknowledge the fact there are distinct differences, advantages and benefits in the new advanced Plasma and LCD technologies, particularly in the larger screen sizes where most manufacturers place their highest performance technology. The revised on mode proposal does improve the specification with respect to larger display sizes.
3. The EPA has stated that one of the criteria used in relation to Energy Star specifications is that “specifications do not unjustly favor any one technology.” However, the Draft 2 specification favored lower end product, contradicting an EPA objective “of pursuing energy efficiency without sacrificing high performance.” PDC is pleased that the revised On Mode proposal recognizes that consumers should be able to choose ENERGY STAR labeled products in the larger, more fully featured displays.
4. Draft 2 did not recognize the distinct differences in technology widely acknowledged and accepted by industry, retail dealers, consumer publications and the entire business community. As a result the Draft 2 approach was contrary to EPCA and discriminated against technologies with characteristics that impact energy consumption.
5. The Draft 2 specification must recognize that different display technologies and screen sizes have different and distinct performance and energy consumption characteristics. The revised On Mode proposal addresses the issue with respect to screen size but still does not differentiate between display technologies.

We also urge the EPA to begin the new program on a date no earlier than January 2009, rather than the current plan of November 2008. This January 2009 timing aligns better with the new product life cycle rather in the middle of a product lineup (November 2008). Lastly, we urge the EPA to consider no earlier than a January 2011 timing for the implementation of Tier 2.

We appreciate the EPA response to the industry comments in creating a better and stronger overall program for consumers, retailers and manufactures.

Respectfully submitted,

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