

Sharp Labs of America

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January 18, 2008

Ms. Katharine Kaplan
United States Environmental Protection Agency
Office of Air and Radiation
Washington, DC 20460

Dear Ms. Kaplan:

Thank you for the opportunity to comment on the proposed ENERGY STAR Program Requirements for Televisions: Version 3.0, DRAFT FINAL. The following comments are on behalf of Sharp Electronics Corporation of Mahwah, New Jersey. Sharp Electronics Corporation is the parent company of Sharp Labs of America, and is a member of the Consumer Electronics Association (CEA).

Sharp Electronics Corporation is pleased to support EPA's ENERGY STAR Program Requirements for Televisions: Version 3.0. We believe that this new specification will help improve television power efficiency across the industry. Such action reduces greenhouse gas emissions, helps the environment and lowers costs for consumers. Sharp fully intends to continue our participation in the ENERGY STAR Program.

Regarding On-Mode power level requirements, Sharp would have preferred a continuous curve for high definition televisions (no discontinuity at 50-inches.) Nonetheless, we support the current proposal.

Sharp recommends two changes to the current draft before it is finalized:

- 1) In definitions 1.G and 1.H, the word "unit" should be replaced with the word "television." Because these definitions include tuners, the definition does not apply to monitors. This minor editorial change would improve clarity on this point.
- 2) In Table 1, we recommend that the separation between standard definition televisions and high definition televisions should be 576 lines rather than 480 lines. Our understanding is that ENERGY STAR is used internationally. Such a change would take PAL 50 Hz standard definition televisions into account.

If the change to 576 lines is not accepted, please consider changing the threshold to 486 lines from 480 lines. Formally, NTSC has 486 visible lines of video. As a reference, please see http://en.wikipedia.org/wiki/Ntsc#Lines_and_refresh_rate.

We believe that the above changes align with EPA's intentions.

Thank you for the opportunity to comment on the proposed specification. We plan to continue our active role in television power standardization efforts, and we look forward to the successful implementation of the next generation ENERGY STAR Program for Televisions.

Please feel free to contact me by e-mail at jonf@sharplabs.com if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jon Fairhurst". The signature is written in a cursive style with a large, stylized initial "J".

Jon Fairhurst
Sharp Laboratories of America