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December 7, 2007

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 On Mode power consumption equations in the Version 3.0 ENERGY STAR TV products specification. The latest On Mode proposals were distributed to stakeholders on November 26. The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the \$148 billion U.S. consumer technology industry through technology policy, events, research, promotion and the fostering of business and strategic relationships. CEA represents more than 2,100 corporate members. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute televisions, with standard and advanced features, across all technology platforms.

We continue to believe that in order for the ENERGY STAR TV products specification to be truly technology neutral it must distinguish products among separate On Mode power consumption equations that factor in display technologies such as LCD, plasma, etc. These display technologies have dramatically different characteristics that lead to differing power requirements. There is ample precedent in existing ENERGY STAR programs for distinguishing products in the same product category based on unique characteristics.

However, we appreciate the EPA's efforts to address the technology neutrality issue with the latest revised On Mode proposal. This latest proposal recognizes the vast expansion of performance requirements being sought with Version 3, including the establishment of an On Mode efficiency requirement and use of IEC 62087 for the first time. The latest On Mode proposal also recognizes that the limited data set, combined with the accelerating pace in technology innovation and changes in consumer demands, complicates the process of predicting compliance levels.

The latest revised On Mode proposal will give manufacturers of all display technology types an achievable energy efficient design goal towards earning the ENERGY STAR label. As such, the ENERGY STAR program will benefit by having its logo associated with the most energy efficient televisions, regardless of the display technology type or feature set.

We strongly urge the EPA to consider the long-term benefits of a "best in class" approach to technology neutrality as it begins to develop the TIER 2 requirements. Such an approach

will provide flexibility for future television technologies and innovations, while generatating power savings across all display technologies.

We appreciate the opportunity to comment on the proposed On Mode power consumption equations in the Version 3.0 ENERGY STAR TV products specification. We look forward to continued close cooperation during the updating of this specification and establishment of the TIER 2 specifications. Please do not hesitate to contact us if you have any questions.

Sincerely,

/s/\_\_\_\_\_

Brian Markwalter  
Vice President, Technology & Standards

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Enclosure

Cc: Kathleen Hogan, Director, Climate Protection Partnership Division, Office of Atmospheric Programs, U.S. EPA

Brian J. McLean, Director, Office of Atmospheric Programs, U.S. EPA