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August 7, 2007

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

Dear Ms. Kaplan,

Attached please find comments and suggested edits from the Consumer Electronics Association (CEA) on the Draft 1 Version 3.0 ENERGY STAR TV products specification. 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.

While the attached document contains comments and suggestions associated with several portions of the Draft 1 Version 3.0 ENERGY STAR TV products specification, we would like to draw your attention to some of the highlights:

- Technology Neutrality In order for the specification to be technology neutral it must distinguish products among separate On Mode power consumption equations that factor in
 - features, including screen resolution
 - display technologies such as LCD, plasma, etc.
 - combination units such as TV/DVD

There is ample precedent in existing ENERGY STAR programs for distinguishing products in the same product category based on unique characteristics. A technology neutral approach to the TV specification will give manufacturers of all display technology types an achievable energy efficient design goal towards earning the ENERGY STAR label. Moreover, 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.

- Download Acquisition Mode (DAM) The currently proposed power consumption limit and associated limits on time allowed in DAM are too restrictive. For example, today's most popular Electronic Program Guide (EPG) service would not meet these limits. In addition, DAM will be used for more than just downloading of EPG – software downloads and emergency message/communications monitoring will also

operate during the DAM. We continue our effort to gather more information about service offerings and power requirements for DAM and intend to propose new specifications as more information becomes available.

We appreciate the opportunity to comment on the Draft 1 Version 3.0 ENERGY STAR TV products specification. We look forward to continued close cooperation during the updating of this specification. Please do not hesitate to contact us if you have any questions.

Sincerely,

/s/_____

Brian Markwalter
Vice President, Technology & Standards

Douglas Johnson
Senior Director, Technology Policy & International Affairs

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Enclosure

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