



December 10, 2007

Katharine Kaplan
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the ENERGY STAR draft television specification. These comments were developed based on the CEE Consumer Electronics Committee's discussion of the "Proposed Specification Levels Based on the Revised Dataset for the Version 3.0 TV Products Specification" distributed on November 26, 2007. Thank you for the chance to provide input on this proposal. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE requests that EPA return to the On Mode specification presented in the original Draft 2. The approach in the most recent proposal does not generate sufficient energy savings in this important, fast-moving product category.

Under the current proposal, 30 percent of units in the market *today* would qualify for the label. In addition, the qualification percentages would be higher at the larger screen sizes than they are at the smaller screen sizes. If a guideline is to ensure there is a healthy representation of qualified units at every screen size, CEE believes a better approach would be to achieve a 25 percent qualification rate at each screen size. Instead, roughly 41 percent of 50-inch units would qualify under the current proposal versus roughly 28 percent of 20-inch units. With the potential for an energy consumption difference of almost 500 kWh/year between a qualified 20-inch and 50-inch unit, significant savings will have been foregone relative to a typical Energy Star program. It is our understanding that the market is moving toward larger screen sizes. There is also the potential for significantly more products to qualify before the specification becomes effective in November 2008 given the rapid pace of technological development and innovation in electronics products.

Without an FTC Energy Guide label for televisions, the ENERGY STAR label will be most consumers' sole source of information on a television's energy consumption. It is therefore especially important the ENERGY STAR reflect that a product is among the most efficient available.

Regarding a Tier 2, CEE would like to request an earlier effective date. This will be particularly important if EPA chooses to proceed with the current proposal given the resultant higher qualification rates and diminished energy savings. CEE recommends an effective date for Tier 2 of May 1, 2010.

Thank you for your careful consideration of our comments. It has been a pleasure working with you through this important process.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

American Council for an Energy-Efficient Economy
BC Hydro
Efficiency Vermont
National Grid
New York State Energy Research and Development Authority
Northeast Energy Efficiency Partnerships
NSTAR Electric
Pacific Gas & Electric
PacifiCorp
Sacramento Municipal Utility District
Western Massachusetts Electric Company
Wisconsin Focus on Energy
Xcel Energy