

Draft Final Version 3.0 ENERGY STAR® TV Products Specification Comment Summary
February 4, 2008

This document is intended to summarize comments submitted by stakeholders in response to the Draft Final Version 3.0 ENERGY STAR TV products specification, and also includes an EPA response to each comment.

Topic	Comment	EPA Response
Technology Separation	Two stakeholders continued to disagree with EPA's commitment to a technology neutral specification. These stakeholders claimed that different television technologies serve different purposes, operate differently, and, consequently, should be treated as separate by the specification. One stakeholder went on to say that flat-panel TVs should have different requirements to Rear Projection units.	EPA remains committed to a technology neutral approach for the On Mode requirements. Because all TVs serve the same fundamental purpose, the ideal would be to simply identify the most efficient among all TV models. However, since consumers consistently use size as a determining factor when selecting a TV, and size significantly affects energy use in the case of nearly all technologies, EPA recognized the need to structure this specification to distinguish energy efficient options in various size categories.
On Mode Levels	The majority of stakeholders expressed support for the revised On Mode requirements provided in the Draft Final Version 3.0 TV products specification. One stakeholder went on to express support for the exact screen size delineations in the On Mode requirements.	No response required.
	A stakeholder requested that EPA modify the delineation between standard definition and high definition televisions to be at 576 lines rather than 480 lines to take into account PAL 50 Hz standard definition units. Alternately, the stakeholder asked that the delineation change to 486 lines to account for NTSC having 486 visible lines of video.	This specification was developed based on NTSC units, therefore EPA is basing its definition for standard definition models on NTSC. Further, NTSC is considered to have active video on lines 23-262 and 286-525, which corresponds to 240 lines on each of two fields or 480 lines in total; this is commonly considered to be the display resolution for standard definition (480 active lines interlaced).
	A stakeholder proposed that EPA allow a +5% margin for the maximum allowable On Mode power consumption across all screen sizes/resolutions, i.e., a relaxation of the power consumption limits due to power variations between individual units.	This would in effect raise the maximum allowable power consumption by 5%. It is EPA's intent that manufacturers ensure that their products fall below the maximum allowable limit; not within +5% of it. Further, other ENERGY STAR electronics specifications provide maximum allowable power consumption limits without a percentage tolerance. For these reasons, EPA does not support this proposal.
	One stakeholder expressed disappointment that the On Mode requirements in the Draft Final specification were made more stringent than the proposal provided to stakeholders on November 26, 2007.	EPA received numerous sets of comments disagreeing with the levels proposed on November 26, 2007 on the grounds that: they were too lenient, particularly for large screens; qualification rates were uneven between different screen sizes; and, the corresponding savings were much lower than those projected from the proposed Draft 2 levels. Following careful consideration of all comments received to date on the On Mode proposals from Draft 2 and November 26, 2007, EPA's Draft Final specification included proposed levels that strove to reflect a more balanced qualification rate across different screen sizes and resulted in an overall qualification rate of 27.4% of models from EPA's dataset.

Topic	Comment	EPA Response
Forced Menu	A stakeholder expressed support for EPA's forced menu option.	No response required.
	A stakeholder requested clarification on whether language provided in Section 4) E.2.d, Testing at Factory Default Settings, which states that manufacturers who ship their TVs with a forced menu option at initial start up must (i) post information on their Web site and (ii) include information in the TV's packaging relaying that the product qualifies for ENERGY STAR in the "home" setting and that this is the setting in which power savings will be achieved, is only applicable to those TVs with a forced menu at initial start up.	Per information provided in Section 4) E.2.d, Testing at Factory Default Settings, the language is only applicable to products shipped with a forced menu where the customer must select upon initial start up the mode in which the product will operate.
Test Procedure	A stakeholder requested that EPA provide clarification on Section 5.2 of the current Draft of IEC 62087, Ed. 2.0, specifically with regards to a maximum warm-up time for LCDs and the term "relevant operating mode."	EPA would like to clarify that Section 5 of the current Draft of IEC 62087, Ed. 2.0 is not applicable to testing of TVs to determine ENERGY STAR qualification under the Version 3.0 TV products specification. Section 11 of the test procedure, with clarifications provided in the specification, is the only section applicable for testing of TVs to determine qualification with the On Mode requirements in Version 3.0.
Tier 2	Several stakeholders commented that they intend to work with EPA on development of more rigorous Tier 2 levels for the Version 3.0 ENERGY STAR TV products specification.	No response required.
	Due to manufacturer production schedules and to allow time to implement the more rigorous requirements, a stakeholder requested that the Tier 2 effective date be delayed to January 1, 2011.	EPA initially proposed a September 1, 2010 effective date for Tier 2 in its Draft 2 Version 3.0 specification, originally distributed to stakeholders in September 2007. This means stakeholders have 3 years notice that more rigorous Tier 2 requirements will take effect in September 2010. EPA will work with stakeholders on the development of these Tier 2 levels.
	A stakeholder expressed a desire for various groups involved in the specification revision process to work together more collaboratively with one another during the Tier 2 development process.	EPA will actively work to facilitate stakeholders working together collaboratively on development of Tier 2 requirements for TVs.
	A stakeholder suggested that future On Mode requirements for TVs take into account the power savings associated with products testing/qualifying in "home" mode.	EPA intends reviewing data submitted on TVs under Tier 1 of the Version 3.0 TV products specification prior to proposing Tier 2 levels, and anticipates the Tier 1 data will reflect lower power consumption due to products being tested in "home" mode, where applicable.
Definitions	A stakeholder requested that the word "unit" should be replaced with the word "television" in the definitions for Analog and Digital for added clarity.	EPA has incorporated this suggestion in the Final Version 3.0 TV products specification.
Other	A stakeholder suggested development of an "action plan" that outlines steps/responsibilities for a successful transition from the Version 2.2 specification to the new Version 3.0 specification, and ensures TVs that meet Version 3.0 requirements will be available at retail in November 2008.	EPA is working with stakeholders, including large electronics retailers, to develop and launch an ENERGY STAR marketing plan around the new Version 3.0 ENERGY STAR TV products specification to (i) encourage retailers to request products from their vendors that meet the new requirements and (ii) educate consumers about the new requirements and the associated savings. EPA is also launching a consumer outreach campaign that will focus in part on TVs in the fall timeframe.