

January 24, 2008

Ms. Katharine Kaplan
Program Manager, ENERGY STAR Program Development
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (6202J)
Washington, DC 20450

Via e-mail to: Kaplan.Katharine@epamail.epa.gov

Re: Comments on ENERGY STAR TV Draft Final (Version 3.0) Program Requirements

Dear Ms. Kaplan:

Panasonic Corporation of North America (“Panasonic”), a leader in the manufacture and sale of flat panel televisions and other consumer video technologies, appreciates the opportunity to comment on the ENERGY STAR TV Draft Final Version 3.0 Program Requirements. We believe this Draft Final document represents an improvement in several areas over previous iterations of the proposed new TV on-mode program; and these are noted below.

To be clear, however, our strongly preferred approach—as we and other commenters have recommended from the outset—would be to establish separate ENERGY STAR classes by TV technology type. We are keenly disappointed that this Version 3.0 document still fails to differentiate among display technologies or to reflect the fact that different display technologies have dissimilar and distinct performance and energy consumption characteristics. Frankly, we believe this remains the primary shortcoming of the Draft Final specification. Consequently, and despite the consistent and near-universal use of separate product TV technology categories by manufacturers, retailers, consumer publications, and consumers themselves in their purchase determinations, the result of the ‘all-TVs-are-the-same’ approach in the Final Draft is a new program that promotes certain technologies at the expense of others. We continue to believe this ENERGY STAR approach violates EPA’s own “technology neutral” doctrine, gives undue weight to a technology (i.e., rear projection TV) which is rapidly disappearing from the marketplace, and exacerbates the inconsistency with Energy Star programs for other products—including the new program for digital TV set-top box receivers which has separate categories for ‘different TV distribution technologies.’ Unfortunately, we believe all these things could undercut, rather than propel, the important and substantial ENERGY STAR brand.

Despite this fundamental difference, we do wish to commend EPA for integrating several energy-saving concepts into the Draft Final specification, including Panasonic’s “forced menu” TV setup proposal, which could help Americans garner upwards of 2.66 billion kilowatt hours in electricity savings in 2011. This calculation is based on an estimate of all TVs sold in 2011, with the “Home” low-power setting enabled. The estimated savings represent the difference between the low-power setting and the high-power setting on all 2011 TVs. The approximate power for LCDs and PDPs at their high- and low-power screen settings was derived from a chart presented by an EPA contractor during a November 6, 2007, ENERGY STAR stakeholders’ conference call.

Panasonic is also pleased EPA has agreed to adopt our screen size classification proposal that provides three clearly distinct screen size ranges for TVs: 1) below 680 square inches; 2) greater than 680 but less than 1047 square inches; and, 3) greater than 1047 square inches. These new size ranges, to the extent possible under the Draft Final specification's single qualification formula, permit larger-size displays (50-inch class and higher) to be evaluated for energy consumption with comparable size models. The designation of three size classes also recognizes that consumers shop by specific TV size; so, this approach clearly supports EPA's objective of helping consumers select the most energy-efficient model in their selected size range. It also helps sustain the ENERGY STAR brand's promise of energy and greenhouse gas emissions savings to consumers without sacrifice in product performance or utility. This is crucial as consumers demand flat-panel TV technologies which also excel at both HDTV and other display requirements in the home.

We would urge, however, one further and crucial change: Please defer the start date for Tier 2 of the specification to January 2011 (instead of September 2010). This slightly later start date squarely aligns with the new products cycle of all TV manufacturers, which is dictated by retailers' long-established purchasing, sales and promotion patterns. As all involved stakeholders explained, in turn, at the October 2007, meeting, the earlier start date of the Fall, imposes very challenging new requirements in the middle of a product manufacturing (and retail marketing) cycle. Also, it is customary among ENERGY STAR product specifications to provide a minimum 2-year period between their initial and second-tier effective dates. In this case, such a 24-month window would afford manufacturers adequate time to modify product designs as needed in order to meet the more challenging Tier 2 requirements: In addition, it would not appear to affect consumers' understanding of the program in that the new requirements would be applied to the latest new TV products, which typically arrive in stores early in a new calendar year.

Throughout the development of the new, on-mode ENERGY STAR TV specification and the process of draft revisions, Panasonic has worked to propose and submit recommendations to EPA that could produce energy savings well beyond those derived from the current, standby power-based specification. As a valued ENERGY STAR Partner since the program's inception, Panasonic greatly appreciates EPA's [forward-looking] efforts to keep the ENERGY STAR label meaningful through the development and implementation of a robust, challenging specification now reflecting the on-mode power consumption of TVs.

Although we may disagree on the best approach for the new on-mode specification, Panasonic does believe the Final Draft Version 3.0 program requirement will help steer consumers toward more energy-efficient TV products and also encourage TV manufacturers generally to pursue technologically feasible efficiency design improvements. For these reasons we support EPA's adoption of this Final Draft proposal.

We would be pleased to discuss this in detail at your convenience; and please know that we appreciate you and your colleagues' continuing consideration of our views

Sincerely,

Peter M. Fannon
Vice President
Technology Policy, Government & Regulation

cc: Dr. Stephen L. Johnson, Administrator, EPA
Mr. Brian J. McLean, Director, Office of Atmospheric Programs, EPA
Ms. Kathleen B. Hogan, Director, Climate Protection Partnership Division, EPA
Ms. Mehernaz Polad, ICF (ENERGY STAR contractor)