

July 30, 2007

Katharine Kaplan
Product Manager, CE and IT
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
MC 6202J
Washington, DC 20460

Re: Comments on ENERGY STAR® Program Requirements for Televisions,
Draft 1, version 3.0

Dear Ms. Kaplan:

Thank you for the opportunity to participate in the ENERGY STAR Stakeholders' Meeting on July 19. Pioneer Electronics supports the goals and spirit of the ENERGY STAR program for some time and looks forward to continuing to participate in the program. We believe that encouraging and supporting energy conservation, consistent with high-quality consumer products are fundamental to our business.

Thank you for this opportunity to comment on Draft 1 of Version 3.0 of the ENERGY STAR Program Requirements for Television, which follow:

Test Methodology: As an initial matter, we fully agree that IEC 62087 (Edition 2.0) is the most appropriate method for testing of "On Mode" power consumption. If there are alternatives suggested, *we would not be support any such changes at this time.*

Data Set Comments: The data set of TV On Mode Power by Type, the data of rear projection (RP) TVs are included as well. However, there is no proportional relationship between "On Mode Power" and "Screen Size" in the case of RP TVs, therefore the data-set chart skews the development of the power consumption by screen area formula, and does not lead to a fair and reasonable specification. Therefore, *we suggest reconsidering the specification of On Mode Power Level Requirements excluding RP TV power consumption data.*

Internet Content: Section (4)(E)(2)(b), "Use of Static Signals for Testing", includes testing via IEC 62087 Section 11.6, "On mode (average) testing with Internet-content video signal". At this time, internet content video signals are not terribly well understood, and in any case, is a very small portion of viewing time. In the future, when viewing of internet content becomes more common and the parameters of that viewing become well understood, measurement of power consumption in that case would be appropriate. However, at this time, Pioneer suggests that tests of internet-content video signal *should not be included* in Version 3.0.

Download Acquisition Mode (DAM):

Power consumption during DAM is a complex and difficult measurement and

engineering exercise, which is affected by many factors (for example, how many and which tuners are active, what sort of persistent storage is active during DAM, etc.). In particular, the 4 watt requirement specified in section (3)(B) is particularly difficult to achieve with technology available today. In any case, *we suggest that DAM power consumption should be factored into the power consumption formula, rather than via hard limits (4W, 1h per 8h)*

Furthermore, *we suggest that the time spent in DAM should be modified considering the practical operational conditions of existing EPG data systems (which require longer periods in DAM mode, less frequently than one hour per eight – typically, at least 3-4 hours per 24). It may be helpful for EPA to encourage the guide data providers to investigate methods to decrease the amount of time spent in DAM mode.*

Maximum On Mode Power Consumption: The maximum On Mode power consumption equation is defined by a single formula. However, its requirement level seems to be too stringent for Plasma Display Panels (“PDP”) as an emissive technology, considering the high technology necessary to secure the brightness in a FHD (“Full High Definition”, or 1080p) PDP. The specification should take into account that FHD displays are a newer, more advanced technology, and therefore, *we suggest that different maximum power consumption equations be developed for HD and FHD respectively.*

Please feel free to contact me if there are any questions. We look forward to working with you and the EPA in the future.

Regards,



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Cc: Adam Goldberg