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

Dear Ms. Kaplan:

Thank you for the opportunity to comment on the proposed ENERGY STAR Program Requirements for Televisions: Version 3.0. The following comments are on behalf of Sharp Electronics Corporation of Mahwah, New Jersey. Sharp Electronics Corporation is the parent company of Sharp Labs of America, and is a member of the Consumer Electronics Association (CEA).

Sharp Electronics Corporation strongly supports the comments from the Consumer Electronics Association with a single exception. We respectfully believe that the new ENERGY STAR Program Requirements for Televisions should implement technology neutrality with a single set of rules regardless of the underlying display technology type.

In particular PDP and LCD televisions should be judged by the same rules – as is the case in the current draft of the Program Requirements. We offer the following reasons:

- PDP and LCD televisions compete directly at retail. Consumers will find PDP and LCD TVs for sale in similar sizes, at similar prices next to each other on the same retail wall or shelf.
- Few consumers understand the technical differences between PDP and LCD.
- There is relative parity in the marketplace. This indicates relative parity in overall performance between the two technologies.
- PDP and LCD TVs serve the same primary purpose – they display TV shows, sports, movies and other video in consumers' homes.

Moreover, the draft ENERGY STAR Program Requirements for Televisions is based on the IEC 62087 Ed. 2 Draft Standard. This IEC standard was developed as a technology-independent method of measuring TV power draw. The draft has gained industry consensus, based on active input from makers of all available display types. The fairness of this draft standard should not be undermined by a double standard at the policy level.

In addition, if EPA ENERGY STAR were to create separate rules for various technologies, there could be negative implications.

- As new TV technologies, such as OLED and SED, emerge, it is not clear if these televisions would be subject to the LCD or the PDP ENERGY STAR Program Requirements. There could be requests for yet more ENERGY STAR power curves – even if the new technology is controlled by only one or two manufacturers.

- If consumers or the media discover that an ENERGY STAR qualification is granted to a 200W PDP-TV, but not to a nearly identical 150W LCD-TV, it would potentially undermine the credibility of the entire ENERGY STAR Program.

In short, a single set of requirements in the ENERGY STAR Program Requirements for Televisions – as indicated in the current draft – is the fairest approach. It would most accurately inform consumers about the true power consumed by the available products, and would best serve the goals of EPA ENERGY STAR.

On another topic, we would like to highlight the benefits of measuring power with TV brightness settings as advocated by CEA's comments and as defined by the IEC 62087 Ed. 2 Draft Standard. Here, we recommend a change in the current ENERGY STAR Program Requirements draft.

Currently, TVs have very bright default levels in order to compete well at retail. In general, these levels are overly bright for optimal TV viewing in the home, leading to unnecessary power consumption during normal use. As long as the tradeoff is between selling more TVs and saving power, power savings will be secondary.

The setting method defined by the IEC 62087 Ed. 2 draft standard allows manufacturers to separate the default settings selected at retail from the default settings that would be selected by the majority of consumers. With no other changes to current TVs or their underlying technologies, this would result in significant power savings for individuals and the community at large. Without such a separation, manufacturers will continue to push for maximum default brightness in search of increased sales.

Some are concerned that manufacturers might cheat the system by producing TVs with unrealistically dark pictures in Standard Mode. This is not the case. Even more important than increased sales is the need to avoid customer returns. If the consumer feels that a newly purchased TV is unacceptably dark, the manufacturer risks a returned product. Manufacturers will not be willing to take such a risk.

This assertion is not just based on theory. The Japanese market offers a practical case study. The JEITA method of power measurement requires TVs to be tested in Standard Mode, rather than as-shipped. We know of no case where a TV made for the Japanese domestic market was produced with an unacceptably dark picture in Standard Mode. Manufacturers are not willing to risk customer returns, brand degradation and bad reviews in the press in order to meet a power target.

In summary, the optimum solution is to have a technology-independent specification that encourages manufacturers to deliver TVs to consumers with optimum settings, rather than with bright, retail-based settings.

Thank you for the opportunity to comment on the proposed specification. We plan to continue our active role in television power standardization efforts, and we wish all involved the best in achieving a successful update to the ENERGY STAR Program Requirements for Televisions.

Please feel free to contact me by e-mail at jonf@sharplabs.com if you have any questions.

Sincerely,



Jon Fairhurst
Sharp Laboratories of America