

Sharp Labs of America

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November 7, 2007

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, draft 2. 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 continues to support EPA's technology neutral policy with a single set of rules, regardless of the display technology used in the television. We also support the change in draft 2 to provide separate formulas, based on resolution. In addition, we are pleased to see that the latest draft supports a user interface solution that allows retail and home picture settings to be decoupled.

Aside from CEA's position on technology neutrality, Sharp Electronics Corporation fully supports CEA's comments to EPA regarding the ENERGY STAR television program. In addition, Sharp Electronics Corporation would like to make the following comments:

- 1) Item 1.I shows the example of 1024x768. This is not a popular resolution among TV makers. We recommend using 1920x1080 as an example with a vertical resolution of 1080.

Also, for clarity, we recommend that "vertical resolution" be changed to "native vertical resolution" in all instances.
- 2) Item 1.P should be titled "Disconnected", rather than "Disconnect."
- 3) In table 1, row two, column one should be "> 480; <= 720."
- 4) Item 2 can be read to imply that TVs with computer inputs would not comply. We recommend that the text be changed from "This specification does not cover products..." to "This specification does not cover monitors..." Also, the final clause after the semicolon is unclear and should be removed.
- 5) Regarding Download Acquisition Mode, we would like to reiterate our support for the CEA position on this topic. Most importantly, we agree that the specified limits apply only to the features and functions that are enabled by default. This will allow manufacturers to innovate new network-based functions and features that can benefit consumers. As network-based features gain popularity, they will become enabled by default, and can be further covered in Tier 2.
- 6) We would also like to restate our support for CEA's position on the effective date. A September 2008 date without any grandfathering is impractical at best.

Of great concern is the requirement to prompt the user each time they turn on the product to “confirm” the choice would have negative consequences. Such a situation would be a burden for retailers with a wall of TVs to confirm. It would also be annoying for consumers who, for whatever reason, truly want the retail mode. A user interface neutral solution would be to state that:

“the manufacturer shall provide a solution for the situation of a consumer buying a floor model previously set in the retail mode that informs the consumer of the situation and allows them to easily change to a non-retail mode.”

- 7) As mentioned by the IEC 62087 project team, the latest draft of the IEC standard references many specific equations and the clause numbering has changed. We urge EPA to follow the new draft standard, which will soon enter the CDV phase.

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