

January 18, 2008

Ms. Katharine Kaplan  
United States Environmental Protection Agency  
Washington, DC 20460

Dear Ms. Kaplan,

By way to this letter Sony would like to present comments to the Draft Final Energy Star TV Specifications. And as always, we thank you for the opportunity to work as a team.

1. It is important to point out that energy consumption in LCD televisions decrease as the television remains in the on state for longer periods of time. Therefore, the power consumption of any LCD television after 15 minutes of warm up will be higher than the same television after 60 and 120 minutes of warm up. This is an inherent behavior of Liquid Crystal Panels.

The EPA calls for IEC 62087 Ed 2.0 for test protocol. We have only been exposed to a draft version of this test protocol. In that draft, the following is indicated in section 5.2: [“Measure the power consumption of the appliance at a time not less than 15 minutes after it has been switched to the relevant operating mode”](#).

Sony feels in addition to a minimum warm-up time, a maximum of 2 hours should be set for 2 reasons:

- a) It will ensure all manufacturers are testing under the exact same guidelines and therefore report power measurements under approximate same conditions.
  - b) It will ensure market surveillance results by the EPA match the reported power consumption by manufacturers and avoid unnecessary disputes.
2. Sony believes the words “relevant operating mode” in section 5.2 of IEC 62087 has lead to confusion among industry members and Sony requests clarification in the Final Document.

For example: Relevant Operating Mode has been interpreted as maintaining the appliance on for x number of hours performing other operations in conditions other than shipped. Then at the time to perform energy consumption measurements there is the need to warm up the appliance for no less than 15 minutes in the actual mode to be tested.

Sony requests the EPA to address this issue to the IEC 62087 working group to express this concern and to seek clarification.

3. On-Mode Power Level Requirements for TV Products

The equations proposed by the EPA yield to a fix number of power consumption.

Referring to the examples provided in the Final Draft for instance, a TV with a 60 inch screen size with 768 or 1080 native resolution should not consume more than 391 watts in order to qualify under version 3.0.

Repeatability analyses show that the exact same models (different samples) consume different amounts of energy. Electronics in general have certain accuracy levels due to tolerances of individual electronic components used in the television.

For this reason, Sony would like to propose a +5% margin be added to the maximum on mode power consumptions for all different screen sizes and resolutions. In other words, we are asking for a relaxation on the power limits with considerations given to the power variations between individual units.

4. Clarification in statement on page 10 section d. Testing at Factory Default Setting

The following paragraph is included in version 3.0 of section mentioned:

“Information relating that the product qualifies for ENERGY STAR in the “home” setting and that is the setting in which power savings will be achieved will be included with the product in its packaging and posted on the partner’s web site, where information about the model is listed”.

The clarification or questions is, is the statement to request power savings be posted on the partner’s web site be applicable only to televisions with a Forced Menu? Or for televisions that qualify for Energy Star in the “home” mode only?

5. Comment: Considering TVs are required to be marked with the maximum power consumption (safety requirements: UL, CSA, etc), we feel the EPA should request manufacturers to report the on-mode power consumption of the television as tested and reported to provide the users this information at hand.

We understand the EPA will make the power consumption of qualifying televisions available to public via web. But Sony feels it is best to include this information in the users manual.

This section has created some confusion. Sony asks the EPA to provide clarification in the Final Document.