JEITA's Comments and Questions on
Draft 2 Version 5.0 ENERGY STAR Displays Specification

We appreciate the opportunity to comment on the Draft 2 Version 5.0 ENERGY STAR Displays specification. After reviewing the Draft, the members of JEITA have the following comments and questions. Thank you for taking the time to consider our comments and respond to our questions.

(1) Note on Page 5 — Maximum viewable diagonal screen sizes for eligible products

The Draft sets the maximum viewable diagonal screen size at 84 inches. We believe, however, that no maximum screen size should be specified because the screen sizes of professional signage are increasing every year.

(2) Note on Page 5 — Products with a tuner

In Japan, products cannot apply for Energy Star as TVs. Therefore, from Tier 2 on, products with tuners would not be able to apply in Japan.

Consequently, we would like the Draft changed so that products with tuners can continue to apply as display monitors as before even after Tier 2 is introduced.

(3) Test Method, Page 10

The requirement that displays must be tested in a laboratory accredited by an accreditation body will lead to increased costs and longer development times. Therefore, we would like the EPA to recognize self-testing by manufacturers as in the past. The reason for our request is that power consumption measurements require no special equipment or technology. (Manufacturers are fully capable of performing these tests on their own.)

(4) Luminance Test Patterns and Procedures, Page 13

We believe that displays that cannot be set to the luminance values specified in Table 4 should be tested at the display's maximum luminance. Thus, we feel the following paragraph should be added to this item in the same way as the Version 4.1 specification.

[If the computer monitor's maximum luminance is less than the luminance value specified in Table 4 (e.g., 150 candelas per square meter), then the technician shall use the maximum luminance (e.g., 150) and report the value to EPA with other required testing documentation. Similarly, if the computer monitor's minimum luminance is greater than the luminance value specified in Table 4 (e.g., 400 candelas per square meter), then technician shall use the minimum luminance (e.g., 400) and report the value to EPA.]

(5) 6) Effective date　Transition time prior to the revised specification taking effect (nine months)

We would like the transition time set to one year. Otherwise, we would like the effective date to be Friday Jan. 1, 2010.　In general, setting effective dates to the first day of a month is easier for manufacturers to control the production than other dates.

Question

(6) Note on Page 8 — Tier 2 On Mode requirements

Will the maximum On Mode power consumption levels be defined in Final Draft 2 (planned for distribution on Dec. 10)? If not, when will they be defined?

(7) Note on Page 8 — Display models with added functionality

Fair comparisons between products are not possible when measuring full-featured products considered in the Tier 2 requirements. Therefore, measurements should continue to follow the Tier 1 requirements.

(8) Displays with Automatic Brightness Control, Page 8

Your calculation for the power consumption value of displays equipped with automatic brightness control assumes operation at an ambient light level of 300 lux for 80% of the time and at an ambient light level of 0 lux for 20% of the time. What is the rationale or basis for this calculation? Furthermore, why did you select 300 lux and 0 lux for the ambient light level conditions?

(9) Page 14 — Effective date

Can the Version 5.0 specification be applied after the final version is issued (Jan. 21, 2009)?