

Appliance Standards Awareness Project  
Consumers Federation of America  
Northeast Energy Efficiency Partnerships  
Alliance to Save Energy  
Northwest Energy Efficiency Alliance

Aug 2, 2017

Ms. Verena Radulovic  
United States Environmental Protection Agency  
Office of Air and Radiation  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: ENERGY STAR Specification for Televisions, Version 8.0**

Dear Ms. Radulovic:

This letter provides comments from the Appliance Standards Awareness Project (ASAP), Consumer Federation of America (CFA), Northeast Energy Efficiency Partnerships, the Alliance to Save Energy, and Northwest Energy Efficiency Alliance on the ENERGY STAR for televisions version 8.0 specification final draft. The following comments complement comments submitted by ASAP and others on the first draft on April 5, 2017 and second draft on May 24, 2017.

We commend EPA for its timely and critically important work in recognizing the energy efficiency leaders in the fast-moving televisions industry and continue to strongly support ENERGY STAR's development of the version 8.0 specification for televisions. In this final draft EPA has addressed several important weaknesses identified in the previous drafts, however we are concerned that changes in technology and user behavior could still undercut expected energy savings.

As noted in our prior comments, customer satisfaction with a television's picture quality plays a strong role in determining whether or not the television is operated efficiently. Research conducted by NRDC shows that some manufacturers seek to circumvent the intent of the ENERGY STAR specification by designing televisions that are energy efficient when subjected to the DOE test procedure, but are not energy efficient under typical viewing conditions. We strongly recommend that EPA act to prevent such televisions from carrying the ENERGY STAR label.

***ENERGY STAR's treatment of Motion Detection Dimming (MDD) remains problematic***

We agree with comments submitted to this draft by NRDC that ENERGY STAR's language regarding "Other Energy Saving Features" is unclear. Given the significant uncertainty that remains about the impact of MDD on real world television energy consumption we recommend the following:

1. ENERGY STAR for Televisions version 8.0 specification should not allow MDD to be turned on during testing.
2. If manufacturers are allowed to test televisions with MDD turned on under the ENERGY STAR for Televisions version 8 specification the test procedure
  - a. Should require supplemental testing on “real world” test clips (eg the test clip developed by the IEC) before a manufacturer is permitted to qualify a television with MDD enabled,
  - b. Should require the television in question to be shipped with MDD enabled, and
  - c. Should cap claimed savings for MDD at 5 Watts.

At a minimum, manufacturers who desire ENERGY STAR qualification for televisions that include MDD should be required to submit results of on-mode power testing with MDD enabled and disabled, using real world test clips. These results obtained from this testing will be critical to the development of ENERGY STAR for televisions version 9.0 as discussed in prior comments. Ideally the results would also be available for review by interested stakeholders.

Thank you for the opportunity to provide these comments on the ENERGY STAR for Televisions version 8.0 specification.

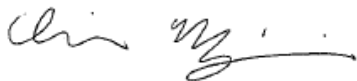
Sincerely,



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