

November 7, 2017

Via E-Mail

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The Consumer Technology Association (CTA)™ appreciates the opportunity to submit comments to EPA on its Revised Final Draft Version 8.0 ENERGY STAR TV specification released on October 24, 2017. CTA is the trade association representing the \$321 billion U.S. consumer technology industry, which supports more than 15 million U.S. jobs. CTA is also an active supporter of the ENERGY STAR program and has championed its importance as a successful, voluntary energy efficiency program.

Throughout the Version 8.0 development process CTA has engaged in good faith with constructive comments aimed at maintaining the energy saving value of the program while avoiding intrusion into product innovation and design. Unfortunately in its most recent draft, EPA has ignored the industry's most fundamental concern that the Version 8.0 specification both limits consumer choice in picture presets and mandates numerous warnings related to picture presets and Special Functions.

The draft specification understandably sets up incentives for default picture settings that make use of energy saving features like Automatic Brightness Control (ABC) in Sections 3.2.4 and 3.2.5. ABC is a great example of industry innovation in support of saving energy in televisions and is prevalent in the market today. EPA oversteps its bounds by going on to specify how many picture presets are required to have ABC and other energy savings features. The point of picture presets is to give consumers a convenient way to choose among various picture performance options.

Finally, the proposed effective date of July 1, 2018 is problematic given the industry's normal model year changeover. In light of the remaining critical concerns with the Version 8.0 specification in its content and proposed introduction date, CTA again requests that EPA not issue the specification at this time. CTA encourages the EPA to maintain ENERGY STAR TV specification Version 7.0 while we work together to revise Version 8.0 in a direction that leaves consumers in control of their televisions.

Best regards,

Brian Markwalter  
Consumer Technology Association

cc: Ms. Verena Radulovic, EPA