



Information Technology Industry Council

August 4, 2015

Ms. Verena Radulovic
U.S. Environmental Protection Agency
Office of Air and Radiation
ENERGY STAR® Program for Consumer Electronics
Attn: displays@energystar.gov

RE: Final Draft Version 7.0 ENERGY STAR Displays Specification

Dear Verena,

ITI appreciates the opportunity to provide input on the Final Draft of Version 7.0 ENERGY STAR Displays Specification.¹ ITI appreciates our partnership with ENERGY STAR in the development of successful specifications and is committed to working with EPA to ensure a successful Version 7.0 of the displays specification. As ITI stated in previous comments in response to Draft 2, there remain outstanding areas of concern in the adoption of the new TEC approach for the displays specification that need to be addressed prior to finalizing the specification. ITI makes the following recommendations prior to finalizing the specification.

1. ITI recommends that the specification normalize pass rates to recognize the top 25% most efficient models in each display size category.

The success of an ENERGY STAR specification depends on EPA setting a pass rate that strikes an appropriate balance between recognizing high efficiency products that meet customer expectations and needs while ensuring that qualifying products remain broadly available. If the percentage of products qualifying for the ENERGY STAR label is too high, this does not help EPA achieve its mission of directing consumers to the most efficient products available and threatens the credibility of the label. If the percentage of products qualifying for the ENERGY STAR label is too low, this limits both customer benefit and industry participation in the program. The ENERGY STAR Products Program Strategic Vision and Guiding Principle document states, "Experience has shown that it is typically possible to achieve the necessary balance among principles by selecting efficiency levels reflective of the top 25% of models available on the market when the specification goes into effect."² For Version 7.0, ITI urges EPA to follow

¹ See ENERGY STAR Program Requirements Product Specification for Displays, Eligibility Criteria Final Draft Version 7.0, available at

www.energystar.gov/sites/default/files/Final%20Draft%20Version%207%20Displays%20Specification.pdf.

² See ENERGY STAR Products Program Strategic Vision and Guiding Principles, Jan. 2012, available at

www.energystar.gov/ia/partners/prod_development/downloads/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf?0544-2a1e.

this historical experience in keeping to the stated goal of the top 25% of products qualifying for ENERGY STAR. Specific to the displays specification, ITI recommends that the pass rate **for each display size category** be adjusted to more closely track with a 25% pass rate to maximize the benefit of the program across customer needs. The below EPA table provides pass rates based on the current specification. The current proposal sets pass rates of 33% for <14 inch displays, 80% for 14-16 in displays and 43% for 16-19 in displays. Placing an ENERGY STAR label on four out of five displays in the 14-16 in category does not appear to meet the objective of ENERGY STAR in identifying highly efficient products for a given category. With larger size displays, the current proposal sets pass rates of 19% for 19-20 in displays, 12% for 20-22 in displays, 24% for 22-24 in displays, 17% for 24-26 in displays and 16% for >26 in displays. The pass rates for the larger display sizes, with the exception of the 22-24 in category, are excessively low. Of particular concern is the 12% pass rate for 20-22 in displays, which is one of the more popular display sizes. Pass rates of 12%, 16% and 17% for display size categories are overly restrictive and too far from 25% to represent an appropriate balance.

Bins	0	Total Res(MP)								
Size (inches)	Res (MP)	0.48-1.049	1.296	1.311-1.44	1.764	2.074	2.765-3.686	4.954	8.294	All
0	Bins	1.05	1.30	1.50	2	2.5	3.8	5	8	0
<14	14	17%		0%		1				33%
14 - 16	16	79%							100%	80%
16 - 19	19	37%	50%	57%						43%
19 - 20	20	57%	15%	19%		0%				19%
20 - 22	22			8%	100%	12%				12%
22 - 24	24				24%	22%	43%		63%	24%
24 - 26	26				0%	18%	11%		0%	17%
≥26	28	0%			0%	17%	3%	0%	43%	16%
All	0	44%	21%	21%	24%	18%	7%	0%	47%	20.4%

Display Size Pass Rates: Final Draft Version 7.0

The specification's approach of averaging across all display sizes to calculate the pass rate of 20.4% for the entire specification is inappropriate as it relies on the assumption that all display sizes ranging from <14 inches to >26 inches are interchangeable with customer uses and demands, which is incorrect. Manufacturers provide different display size options because customers demand and prefer different sizes based on their uses. The specification should be adjusted to recognize the top 25% of products for each category of display sizes, rather than setting up extreme preferences for small display sizes that do not take into account real world customer needs.

Finally, ITI is concerned with the trend at EPA of setting levels below 25% at finalization of the specification in an effort to future proof the specification for the time the specification goes into effect. This introduces a guessing element into what would otherwise be a data-driven process. While it is true in the past that manufacturers have made advancements to increase the percentage of products on the market that qualify for ENERGY STAR, setting an overly restrictive cap penalizes rather than rewards this behavior. Rather than attempting to future proof a specification based on the possibility that manufacturers may or likely will work to increase the percentage of products that can qualify, EPA should reset limits on an appropriate frequency, approximately every two years, and set appropriate limits based on the 25% goal to make sure that customers can still purchase an adequate number of qualified products. As regulations and ENERGY STAR specifications become more restrictive, the rate at which manufacturers can continue increasing the number of products that can qualify for ENERGY STAR is currently and will continue to taper off, particularly given customer preferences for larger displays. ITI appreciates EPA's desire to keep specifications up to date and is committed to working with EPA to update specifications at regular intervals.

2. ITI recommends that the definition of Enhanced Performance Displays (EPD) be included in Section 1 of the specification.

The Final Draft does not include the definition for Enhanced Performance Displays in the definitions section of the specification. While the On Mode limits do account for the characteristics and additional power consumption EPDs require in On Mode in section 3.3.4, there is still a need to include a specific definition for EPDs in the product definitions Section 1. We recommend retaining the existing Ver. 6.0 definition Section 1.A. 1) a) 1, so that there will be clarity as to the products that can use the EPD On mode formula and limits.

Extract of Ver. 6.0 Display Program Requirements Definition for Enhanced Performance Displays

(EPD): Enhanced-Performance Display: A computer monitor that has all of the following features and functionalities:

(a) A contrast ratio of at least 60:1 measured at a horizontal viewing angle of at least 85°, with or without a screen cover glass;

(b) A native resolution greater than or equal to 2.3 megapixels (MP); and,

(c) A color gamut size of at least sRGB as defined by IEC 61966 2-1. Shifts in color space are allowable as long as 99% or more of defined sRGB colors are supported.

As other entities, utilize and refer to ENERGY STAR program requirements for definitions of products, it is critical to maintain a clear definition of EPDs. ITI appreciates EPA's goal to provide flexibility with the definition of EPDs as technology evolves, but ITI believes regular updates of the specification will be able to adjust this definition in a timely manner.

3. ITI recommends that the definition of signage displays be amended.

ITI recommends that the definition of signage displays be amended as follows:

Signage Display: An electronic display intended for multiple people to view in non-desk based environments, ~~such as retail or department stores, restaurants, museums, hotels, outdoor venues, airports, conference rooms or classrooms.~~ For the purposes of this specification, a display shall be classified as a signage display if it meets two or more criteria listed below:

The examples and explanations are extraneous to the definition of a signage display. Removing examples or applications from the definition will result in a cleaner definition for both the ENERGY STAR specification and other jurisdictions.

Conclusion

ITI appreciates the opportunity to provide comments and looks forward to working with the EPA to insure the success of the Version 7.0 specification. We request that EPA delay finalization of the specification until EPA and industry have had adequate time to consider the above areas of concern.

Sincerely,

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