

July 27th, 2015

Ms. Verena Radulovic
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ENERGY STAR Program
U.S. Environmental Protection Agency
Via e-mail: displays@energystar.gov

Re: Panasonic Comments on ENERGY STAR Displays V7.0 Final Draft Eligibility Criteria:

Panasonic appreciates the opportunity to comment on ENERGY STAR Displays V7.0 Final Draft Eligibility Criteria. As a leading manufacturer and marketer of display technologies, Panasonic is a strong supporter of the ENERGY STAR brand and its program objectives, which have been exemplified in the current lineup of our most efficient display models ever. Our comments about the final draft be section are detailed below.

Section 3.5.2 Table 5: Full Network Connectivity Allowance for Signage Displays:

Section 3.5.2 states:

“Products with Full Network Connectivity confirmed in Section 6.7 of the ENERGY STAR Test Method and with the capability to transition from On Mode to Sleep Mode via a signal over an Internet Protocol connection shall apply the allowance specified in Table 5.”

The Final Draft has added the phrase, “and with the capability to transition from On Mode to Sleep Mode via a signal over an Internet Protocol connection.” This added phrase requires the display to “transition from On Mode to Sleep Mode via a signal over an Internet Protocol connection”. This is not a requirement of Full Network Connectivity nor of any other display or TV regulation that we are aware of, and should therefore be removed.

The Section 1)D2) definition of Full Network Connectivity states:

“The display can elect to change power states based on receipt of network data from remote network devices, but should otherwise stay in Sleep Mode absent a demand for services from a remote network device.”

This refers to the optional capability to change power states from Sleep Mode to another power state. It does not refer to a transition from On Mode to Sleep mode, nor does it require a transition from Sleep Mode to On Mode.

It should also be noted that the ENERGY STAR Displays Test Method V7 Final Draft Section 6.7) B) requires the presence of Full Network Connectivity to be determined by testing the Display for network activity in Sleep Mode according to section 6.7.5.2 of CEA-2037-A, Determination of Television Set Power Consumption. This is a comprehensive and sufficient test to verify the display is providing Full Network Connectivity. Any additional requirements are unnecessary and will result in confusion in implementing this verification test.

We recommend that the Section 3.5.2 added phrase, “and with the capability to transition from On Mode to Sleep Mode via a signal over an Internet Protocol connection,” be removed.

Minor corrections:

Section 3.4.1:

“Pon_max is the Maximum On Mode Power in watts, per equation 7.”

Equation 7 should be equation 6.

Section 3.5.1:

“Measured Sleep Mode Power (Psleep) in watts shall be less than or equal the sum of the Maximum Sleep Mode Power Requirement (Pon_max)...”

“Pon_max” should be “Psleep_max”.

Section 6.1.1

“The Version 6.0 ENERGY STAR Display specification shall take effect on April 30, 2016.”

“Version 6.0” should be “Version 7.0”.

Final Draft Test Method, Section 6.3)A)1)

The section 6.3)A)1) of the Final Draft Test Method begins:

“For Signage Displays with viewable diagonal screen size of 30 inches or more”

Since the Eligibility Criteria Section 1)A)1)b revised definition for Signage Display allows diagonal screen size to be less than 30-inches in some cases, then the phrase “with viewable diagonal screen size of 30 inches or more” should be removed from the Test Method Section 6.3)A)1). The revised heading would be only, “For Signage Displays”. This would allow all Signage Displays to be tested similarly.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with EPA has provided a valuable tool by which consumers can make better informed choices about their purchases of energy efficient products.

As always, Panasonic appreciates the opportunity to comment on the ENERGY STAR Displays V7.0 Final Draft Eligibility Criteria and welcomes the opportunity to further discuss our views with you.

Sincerely,

Mark J. Sharp
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