



Sony Electronics Inc.

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October 1, 2010

Ms. Ann Bailey
Chief, Energy Star Labeling Branch
U.S. Environmental Protection Agency
Washington, DC
ENERGYSTARVerificationProgram@energystar.gov

cc: Katharine Kaplan

Dear Ms. Bailey:

On behalf of Sony Electronics Inc, I respectfully submit the following comments on the Proposed Revisions to ENERGY STAR Program Requirements (Partner Commitments). Additional comments will be submitted separately to address the proposed changes in the Product Specification for Televisions, Computers, and Audio/Video Products.

While Sony would like to express gratitude to the EPA for extending the deadline to submit comments for the proposed changes in the Product Specifications for Televisions, Computers, and Audio/Video products, we would like to take this opportunity to request the ENERGY STAR program administrators to provide sufficient time to allow for proper vetting, discussions and internal analysis. Because compliance with the ENERGY STAR program can be onerous, especially with regard to accurate data submissions, these proposed changes, even if seemingly insignificant, require considerable discussion internally from dedicated resources.

Sony Electronics has long supported the goals of the ENERGY STAR Program. Indeed, we were the program's first Home Electronics Partner of the Year. Although we have expressed concern regarding recent changes within the administration of ENERGY STAR, to date we have complied with these proposals because of our strong corporate philosophy promoting energy and environmental conservation.

Qualifying Products

In our comments submitted on April 30, 2010 and on August 6, 2010 we expressed our opposition to any mandate for third party testing. Such a requirement represents a serious impact on Sony Electronics and other manufacturers, resulting in significantly increased costs for testing and shipping of products and most importantly may result in a considerable delay of product introduction on the market. Sony Electronics continues to believe that we have developed an excellent association with ENERGY STAR throughout our many years of participation using self-declarations and market place verifications.

In the event the ENERGY STAR program requires manufacturers to obtain certifications of ENERGY STAR qualification from a Certification Body recognized by the EPA, we strongly request that program administrators delay the implementation date to allow manufacturers to create a structured test plan and explore possible alternatives to program participation.

A delay in implementation will also mitigate the impact to our sales during the extremely busy months of December through February, coinciding with our new model release dates.

Electronic Labeling (For Televisions)

Sony recommends that program administrators allow a variety of options when displaying the ENERGY STAR logo. In addition to allowing the mark to be displayed where the pre-set picture settings are selected, the mark should also be allowed to be displayed in the menu screen where the ECO features of the television are selected, and similar to computers, manufacturers should be allowed the option to display the mark during start-up.

Sony asks the EPA to recognize that manufacturers develop software and on screen menus in different ways. The ultimate goal of electronically informing the customer that they have purchased an ENERGY STAR television can be accomplished in many ways and we ask that you allow manufacturers design flexibility when doing so.

The Computer and Audio/Video groups in Sony have reviewed the ENERGY STAR Partner Commitments but have no specific comments to share at the moment.

Thank you in advance for your careful consideration of our comments.

Sincerely,



Alan Benedict
Director, Service Engineering
Sony Electronics Inc