

ENERGY STAR Version 9.0 Final Draft Specification Comment Response Document

Topic	Comment Summary	EPA Response
General	<p>Several stakeholders expressed support for the Version 9.0 specification, noting that the updated criteria will be more representative of average consumer use of the latest television technology. Specifically, stakeholders supported the revised HCR definition and alignment with the ANSI/CTA-2037-C test method.</p>	<p>EPA appreciates these comments.</p>
On Mode Criteria	<p>A stakeholder proposed the use of weighted On Mode metrics that factor in the typical usage of each preset picture setting based on recent survey data. The survey included 100 participants from California and indicated that 26% consumers keep their TV in the default picture setting while about 58% change to the brightest picture setting. This stakeholder recommended using this information to weight the results of each of the three picture settings being considered as part of the Version 9.0 criteria.</p>	<p>EPA appreciates this additional information and understands the merits of this suggestion to improve representativeness of how the TV is being used. However, this suggestion warrants further research and investigation of more consumers and in diverse geographical locations. EPA included this in the Considerations for Future Revisions section of the specification.</p>
High Contrast Ratio (HCR)	<p>Several stakeholders supported the updated HCR definition to prevent misidentification. One stakeholder supported the updated preset picture setting requirements and interpolation instructions.</p> <p>A stakeholder suggested reviewing additional HCR model data to determine if the HCR adjustment factor should be reduced. Another stakeholder recommended removing the HCR adjustment factor for the following reasons:</p> <ul style="list-style-type: none"> • It will discourage energy efficiency. Some models are close to meeting without an adjustment factor, which demonstrates that if efficiency gains are implemented, OLED models would not need an adjustment factor to meet. • Test data shows that certain OLED TVs would qualify without an adjustment factor and that there has been an efficiency improvement of 16.9% when comparing 2020 and 2021 models. • Lowering the bar for OLED technology would not be technology-neutral. • It conflicts with precedent as plasma TVs had HCR, yet were not given an adjustment factor to meet ENERGY STAR. 	<p>EPA reviewed the full data set of 12 HCR models, which demonstrated a 25% pass rate (3 out of 12) of HCR-capable TVs. One of these models were within 1% of meeting the requirements without the adjustment factor but the vast majority of the models could not meet with the adjustment factor. Based on this data, EPA believes the adjustment factor reflects the intention to recognize the top-performing HCR models.</p> <p>Also, the observed increases in efficiency between the 2020 and 2021 models supports EPA’s belief that there are readily available means by which manufacturers can increase efficiency and reinforces the viewpoint that by making ENERGY STAR certification obtainable for these products, there is an incentive for manufacturers to do so. Additionally, these models observed to meet requirements after some redevelopments are significantly more efficient than comparable models that have not been updated, which supports the notion that the models that have been engineered to perform well above the baseline should be recognized.</p> <p>EPA acknowledges that as new technologies emerge, these proposed criteria levels may need to be adjusted. However, there is no current data to support that future technologies will increase efficiency while providing a similar contrast ratio or when these technologies may be available on the market. The appropriateness of the HCR adjustment factor will be reevaluated as additional models that qualify for it are introduced to the market or when new technology is available that demonstrates similar contrast ratio with increased efficiency.</p>
Test Method	<p>A stakeholder noted that the latest version of the ANSI/CTA-2037-C test method has 150 lux as the highest illuminance testing condition, not 140 lux.</p>	<p>EPA appreciates this clarifying comments and has made the necessary updates to reflect this in the specification.</p>