

Topic	Subtopic	Stakeholder Comment	EPA Response
Requiring Energy Saving Features that Offer Comparable Energy Savings		A stakeholder expressed concerns with the requirement in Section 3.2.3 of the Revised Final Draft, that testing to the Federal Test Procedure must provide comparable savings to those demonstrated during typical viewing experiences. The stakeholder noted a lack of specificity for determining compliance to this requirement. This stakeholder asked that EPA work with industry to update relevant TV power measurement standards.	As TV technologies continue to evolve, DOE and EPA support external stakeholder efforts to revise test content (i.e., test clips) to better account for how products perform under more realistic consumer viewing conditions. Also, EPA encourages manufacturers to share additional data to help improve understanding of energy savings features across different content. As with ABC, where its energy savings potential has been demonstrated and widely accepted by stakeholders, once energy savings of features such as Motion Detection Dimming is well understood, EPA will be in a better position to encourage their use.
Alerting Consumers to Power Consumption Changes	General	Two stakeholders noted that the number of alerts required in Sections 3.2.5 and 3.2.8 of the Revised Final Draft may result in a negative user experience, though one stakeholder also commented that Section 3.2.5 will incentivize energy saving features.	The requirements for consumer alerts when television settings have been modified to reduce the need for warnings, as detailed below.
Alerting Consumers to Power Consumption Changes	Section 3.2.5.i in Revised Final Draft	One stakeholder recommended strengthening the requirement in Section 3.2.5.i of the Revised Final Draft such that it would apply to multiple picture settings, not just the one that was tested to ENERGY STAR as follows: "The product shall display on screen information indicating which Preset Picture Settings, including the Default Picture Setting, reflects settings under which the product qualifies for the ENERGY STAR."	EPA notes that manufacturers are free to identify additional picture settings if they so choose. However, with the Final specification, EPA is maintaining the Revised Final Draft requirement that only the Preset Picture Setting tested to ENERGY STAR be identified as such.
Alerting Consumers to Power Consumption Changes	Section 3.2.5.ii in Revised Final Draft	Specifically, in Section 3.2.5.ii of the Revised Final Draft, the stakeholders stated that the requirement to notify consumers that an energy saving feature is being disabled each time another picture setting is selected (that does not have that energy saving feature) will disrupt their ability to use the product in a manner they choose. They requested that EPA remove this requirement. One of these commenters stated that the definition of what constitutes an energy saving feature or a special function in these requirements is vague, making compliance difficult to determine.	EPA has removed this requirement that a TV provides an alert when a consumer chooses a preset picture setting that does not have an energy saving feature enabled by default.
Alerting Consumers to Power Consumption Changes	Section 3.2.5.iii in Revised Final Draft	One stakeholder commented noted that a consumer should not be forced to repeatedly turn off the same feature in a given preset picture setting, which is contrary to Section 3.2.5.iii in the Final Draft.	EPA has retained this requirement (in Section 3.2.5.ii in the Final Specification) in response to stakeholder input throughout the specification revision process regarding concerns that energy savings features would be disabled without the consumer knowing.
Alerting Consumers to Power Consumption Changes	Section 3.2.5.iv in Revised Final Draft	One stakeholder commented that Section 3.2.5.iv in the Final Draft Specification, by constraining the names of the Preset Picture Settings, "eliminates a manufacturer's ability to showcase or highlight different present picture settings" and "disincentivizing manufactures from developing new technology".	EPA has retained this requirement (in Section 3.2.5.iii in the Final Specification) that preset picture settings should not contain favorable subjective language to describe them, like 'Optimal' or 'Preferred', because this is expected to steer consumers away from the ENERGY STAR-certified picture setting.
Alerting Consumers to Power Consumption Changes	Section 3.2.7 in Revised Final Draft	One stakeholder commented that Section 3.2.7 of the Final Draft produces a negative user experience by inundating the user with energy information and potentially constraining future designs.	EPA has retained this requirement as it is intended to notify consumers of energy consequences that may not otherwise be apparent.

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ABC and Persistence		<p>One stakeholder supported the recognition of ABC in the Default Picture Setting as an effective energy saving feature because it reduces energy consumption "without being intrusive to consumer's viewing experiences". Another stakeholder supported EPA efforts to increase the persistence of ABC across picture settings because it will "maximize energy savings realized by consumers".</p> <p>Two stakeholders requested that EPA remove the requirement specifying how many picture settings have ABC enabled in order to certify to ENERGY STAR with ABC. One noted that the different picture settings are "uniquely designed to meet a specific use case for consumers" and requiring that ABC be enabled by default in a majority of picture settings will result in the settings being indistinguishable from one another.</p> <p>In addition, the requirement applies to any future energy saving features, which could have an unknown negative impact on the development of new technologies.</p>	<p>EPA has retained the requirement that ABC be enabled in a majority of preset picture settings if it is used during testing to certify a product to ENERGY STAR. EPA notes that certification with ABC is optional, and the Agency has not prescribed how to implement ABC in each setting, only that it be maintained in the setting. On the effective date of a revision to the Federal Test Procedure that addresses the persistence of energy saving features, this requirement will be superseded by the provisions of that test procedure.</p>
Luminance Requirements		<p>A stakeholder supports both new luminance requirements in Version 8.0 to provide the consumer with a positive experience and to maintain the persistence of ABC in the home.</p> <p>Another stakeholder noted that there is variability in luminance among TVs of any given model. The stakeholder requested that the average luminance requirement be greater than or equal to 35% of the luminance in the Brightest Selectable Picture Setting, instead of 50%. This lower target would be achievable for more TVs. They also suggested that EPA remove the cap for TVs with a maximum screen luminance above 300 cd/m², for a consistent ratio of default to brightest luminance.</p> <p>This stakeholder also requested that EPA remove the minimum luminance requirement at 3 lux because manufacturers would need to design TVs to a higher minimum luminance at 3 lux to account for variability from one model to another, and this could result in screens that are too bright and waste energy.</p>	<p>EPA received an additional request to further ease both the average and dark room viewing minimum brightness requirements. EPA analyzed this latest proposal and found that accepting it amounted to accepting a 30% reduction in average brightness for 75% of the models in the ENERGY STAR dataset. Further, the proposal did not guard against overly dim ENERGY STAR TVs at 3 lux. As recently as January of 2018, Consumers Union advised consumers to disable the ENERGY STAR setting due to dimness. Therefore, in the absence of new data, EPA has kept the Final Draft luminance requirements.</p>
UHD Allowance		<p>A stakeholder supports limiting revisions to the currently proposed persistence and luminance requirements with the understanding that the efficiency criteria and UHD allowance will be reassessed immediately upon receipt of new performance data, and preferably no later than July 2018.</p>	<p>Given the intent of the Version 8.0 specification revision to ensure the persistence of ABC and other energy savings features, EPA has not proposed changes to the power consumption requirements. EPA will continue to monitor the market and plans to revisit the power consumption limits for both HD and UHD TVs with the next specification revision.</p>
Timeline		<p>Several stakeholders commented on the timeline, calling the originally proposed July 1, 2018 effective date unworkable. One requested a delay until the start of 2019 due to delays in finalization, while three others requested a delay until March 1, 2019 to align with product development cycles, noting that manufacturers introduce new products after the Consumer Electronics Show in January.</p>	<p>The specification's effective date has been shifted to better align with the model year cycle.</p>