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October 14, 2011

Ms. Verena Radulovic
Mr. Christopher Kent
ENERGY STAR Program
U.S. Environmental Protection Agency
Washington, DC 20460

Subject: Comments on ENERGY STAR Displays Draft 2 Specification

Dear Ms. Radulovic and Mr. Kent:

On behalf of the Consumer Electronics Association, I am providing comments on EPA's Draft 2 Version 6.0 ENERGY STAR Displays specification ("Draft 2").

The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the \$190 billion U.S. consumer electronics industry. CEA represents more than 2,000 corporate members involved in the design, development, manufacturing, distribution and integration of audio, video, in-vehicle electronics, wireless and landline communications, information technology, home networking, multimedia and accessory products, as well as related services that are sold through consumer channels. For many years, CEA has supported and advanced energy efficiency in consumer electronics as part of the industry's broader commitment to environmental sustainability. CEA's comprehensive approach to energy efficiency includes industry initiatives related to public policy, consumer education, research and analysis, and industry standards.

Expanding ENERGY STAR beyond its core focus on energy efficiency is unnecessary and duplicative.

CEA recognizes that EPA is attempting to broaden the scope of the ENERGY STAR program to cover factors not related to the energy efficiency of the product in question. EPA's attempt to change the nature of the ENERGY STAR program in this way is evident in the specification revision for displays as well as the revisions now underway for computers, televisions and audio/video equipment. EPA's desire to go beyond energy use and include multi-attribute criteria in ENERGY STAR specifications effectively duplicates the private sector's existing EPEAT eco-labeling program, which EPA actually helped to fund several

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years ago, as well as other private sector initiatives –including companies’ own sustainability initiatives that often go beyond regulatory requirements. On behalf of its members who are the major partners in the ENERGY STAR program, CEA continues to request that EPA keep the ENERGY STAR program’s focus on energy efficiency.

Draft 2 does not reflect EPA’s recent assurances concerning non-energy-use requirements.

At EPA’s Displays specification stakeholder meeting on September 27, 2011, we understand that EPA made the following assurances concerning non-energy-use requirements:

1. EPA would not aim to create product differentiation around non-energy requirements;
2. EPA would commit to referencing existing standards already in the marketplace; and
3. EPA would propose that existing reporting efforts and maintenance of quality assurance documentation would suffice and would not be reviewed as part of the ENERGY STAR product certification process.

Draft 2 is inconsistent with these assurances.

CEA opposes EPA’s proposed inclusions of non-energy-use requirements in the Draft 2 Version 6.0 ENERGY STAR Displays specification.

For several reasons, CEA opposes EPA’s proposed inclusion of non-energy-use requirements in Draft 2.

First, the expansion of the ENERGY STAR program beyond end-use product energy efficiency risks undermining the nature of ENERGY STAR, which presents a simple, clear, energy-related brand image to consumers.

Second, EPA’s attempt in Draft 2 to move beyond product use-phase energy efficiency contravenes attempts by stakeholders –including EPA– to harmonize the energy efficiency programs for electronics in other regions around the world. One major international governmental stakeholder, the European Commission, was very clear in its earlier comments on the Displays specification revision that EPA should remain focused on energy consumption in the use phase of the product.

Third, the inclusion of non-energy-use requirements in the Displays specification could subject program partners to third-party review of those requirements through the EPA’s

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existing third-party certification process for ENERGY STAR (which, as we have stated previously, is already a costly and unnecessary burden for the consumer electronics industry).

Finally, non-energy-use criteria are already being addressed by other public and private sector environmental sustainability programs. Attempting to repeat these criteria in ENERGY STAR through the Displays specification as well as other product specifications is unnecessary and duplicative. It also would add a layer of complexity to the Displays specification with no direct improvement to environmental sustainability.

On behalf of CEA, thank you for the opportunity to provide comments, and please do not hesitate to contact us with any questions or requests for additional information.

Sincerely,

/s/

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