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On Rulemaking for Computers, Computer Monitors, and Signage Displays

Additional submitted attachment is included below.

From: Joe Murru <joe.murru@csagroup.org>
Sent: Tuesday, December 13, 2016 5:57 AM
To: Energy - Docket Optical System
Subject: Rulemaking for Computers, Computer Monitors, and Signage Displays

Hello, I have a comment on the Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays.

The following in red is the latest wording from the Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays at http://docketpublic.energy.ca.gov/PublicDocuments/16-AAER-02/TN214562_20161123T150059_Notice_of_Availability_of_15day_Language__15day_language_combin.pdf :

"(F) During testing, a notebook computer, mobile gaming system, portable all-in-one, or integrated desktop shall proceed using Section 5.2(A)(1) and ignore the direction ~~not~~ to disable automatic brightness control as described in Section 5.2(A) of the *ENERGY STAR Program Requirements for Computers, Final Test Method (Rev. March-2016)*. If automatic brightness control is supported and is enabled by default, position a light such that 300 lux directly enters the automatic brightness control sensor. If automatic brightness control is not enabled by default or the luminous emittance of the display is less than described in the *ENERGY STAR Program Requirements for Computers, Final Test Method (Rev. March-2016)* Section 5.2(E), then configure luminous emittance of the display per Section 5.2(E) of the *ENERGY STAR Program Requirements for Computers, Final Test Method (Rev. March-2016)*."

The way the above section of the test method is currently worded, if the product has ABC enabled by default then ABC <u>is not</u> disabled and 300 lux is fed into the ABC sensor. If after feeding in the 300 lux the luminance of the display is $\geq$ 90 or $\geq$150 cd/m^2 (whichever is required) then it is tested at that luminance level. If the required luminance of 90 or 150 cd/m^2 is not attained after feeding in the 300 lux then the brightness of the display is increased to achieve the required 90 or 150 cd/m^2.

I believe that if ABC is enabled by default on a product then ABC <u>should be disabled</u> per the ENERGY STAR test procedure in order to obtain repeatable and reproducible test results. Since the implementation and calibration of ABC will vary among manufacturers, changes in the lighting to which the ABC sensor is initially subjected will yield different results in different test labs with potentially large variations. ABC calibration may also vary for each of the different product types included in the scope of the rulemaking.

Thanks
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