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California Energy Commission
Docket No. 09-AAER-1C
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, California 95814-5504

November 2, 2009

Dear CEC –

JVC would like to thank the California Energy Commission for the opportunity to comment. JVC is proud of our long history as a leader in energy efficiency. Since the founding of the Energy Star program in 1997, all JVC TV models have been EnergyStar compliant. All of our current models are listed on the EnergySTAR TV 3.0 database. In the screen sizes where we participate, all JVC TVs are leaders for their screen size. Given that long record of leadership in energy efficiency, it is easy to see how the CEC Staff Report, submitted for the 10/13/09 CEC meeting,

http://www.energy.ca.gov/appliances/2009_tvregs/documents/2009-10-13_hearing/2009-10-13_STAFF_PRESENTATION.PDF,

could misinterpret the data, and give us even more credit than we deserve. JVC would like to go on the record to correct the factual errors in the data, and the resulting wrong conclusions drawn from this faulty data. These factual errors, wrong conclusions, and misinformation are contained in slides 26 and 31 of the CEC staff report.

Slide 26 is wrong in three ways when it states that there are 20 JVC TVs which already qualify for the Tier II regulations.

First, although the 10/6/09 version of the Energy database

http://downloads.energystar.gov/bi/qplist/tv_prod_list.xls

lists 35 JVC models, there are **only 15 current** JVC TV models.

- Two listings duplicate the same set. The placement of a hyphen (-) in the model number is the only difference. LT-19D200 is the same as LT19-D200
- One model, GD-42X1U, is for professional use, sold by JVC Professional Products Company, and marketed only to professional users in the content creation industry.
- 18 listings are old models that are discontinued, and no longer available for sale. What is the meaning or benefit of these discontinued models if a California consumer can no longer purchase them?

Second, of JVC's 15 current models listed below, only 5 meet the proposed Tier II regulations for ON Mode Power Consumption.

- **19" class (.12 x 146.3) + 25 = 42.56 W**
- ☑ LT-19A200 – 33.6 W

- ☑ LT-19D200 – 34.1 W
- **32” class (.12 x 424.24) + 25 = 75.89 W**
 - ☒ LT-32A200 – 76.5 W
 - ☒ LT-32D200 – 79 W
 - ☒ GD-32X1U – 97.3 W
 - ☒ LT-32J300 – 95.18 W
 - ☒ LT-32JM30 – 95.18 W
 - ☒ LT-32P300 – 95.18 W
- **42” class (.12 x 754.37) + 25 = 115.53 W**
 - ☑ LT-42WX70 – 110.6 W
 - ☒ LT-42J300 – 119 W
 - ☒ LT-42P300 – 127 W
 - ☒ LT-42B300 – 189 W
 - ☒ LT-42BD30 – 189 W
- **46” class (.12 x 910.78) + 25 = 134.29 W**
 - ☑ LT-46J300 – 131.5 W
 - ☑ LT-46P300 – 131.5 W

Third, since ON mode power consumption is only one parameter that must be met to qualify for the proposed CEC Tier 2 regulations, any analysis of the impact of those proposed regulations must also include all other parameters.

Power Factor Correction – Of the 5 current JVC models that qualify for Tier 2 in terms of power consumption, **None** have PFC, and all are below the proposed 0.9 PFC minimum specification.

Auto Power Down – Of the 5 current JVC models that qualify for Tier 2 in terms of power consumption, **None** have Signal Sensing Auto Power Down to shut the TV off when it senses no signal for 15 minutes.

Given these three factual and analytical errors, the text box on Slide 26 should read
**“JVC – 0 current Tier 2 TVs
 0 in any screen size range
 0 percent better than Tier 2”**

Slide 31 continues the errors noted on Slide 26, and compounds them by drawing an incorrect conclusion based on faulty analysis of bad data.

As stated above, **none** of the JVC TVs meet all of the parameters contained in the proposed Tier 2 regulations.

First, slide 31 refers to the LT-42P789, a previous, discontinued model with limited i-Pod capability. The LT-42P789 (111.1 W) had a much simpler operating system with a smaller, less powerful, TV level microprocessor that provided limited i-Pod capabilities. The current model, LT-42P300, has a more complex operating system (designed in collaboration with Apple) with a larger, more powerful microprocessor that consumes more energy (127 W). The more complex OS enables the consumer to control all of the functions of the i-Pod from the TV’s remote control. It adds remote control to the i-pod which otherwise requires direct touch on the face of the i-Pod. I-Pod control commands like “search for a particular movie” are more complex than TV commands like channel

+/- or volume +/- . Since this more complex operating system is at the core of this model, it is operating whenever the TV is in the ON mode. It cannot be turned off, or operate only when the i-Pod is docked in the TV.

This full-function remote control through the TV's i-Pod dock is a significant additional consumer benefit. It is an innovation that will be stifled, and no longer available to consumers in California under the proposed Tier 2 regulations.

The title on Slide 31 should read “**Tier 2 stifles innovation – i-Pod docking station**”

Summary – Given the factual errors that are contained in the Staff Report, and the misrepresentation of the consequences in the proposed Regulations, the Staff Report should be withdrawn. It should be redone with accurate data, and re-analyzed to provide an accurate assessment of the impact of these proposed regulations.

We can only speak to the specifics of JVC's products. Who knows what other errors are contained the data from other manufacturers, and the possibility of additional faulty analysis of other TV manufacturers products and features. It is not in the best interest of California consumers to restrict their choices with bad regulations, based on faulty conclusions, which are drawn from bad data.

Thank you for the opportunity to correct the record.

Sincerely,

A handwritten signature in black ink, appearing to read "Dad Kline", with a long horizontal flourish extending to the right.

David Kline
GM, Strategic Product Planning
JVC Americas Corp.