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April 15, 2009

Mr. Arthur H. Rosenfeld
Chairman and Presiding Member, Efficiency Committee
California Energy Commission
Docket No. 07-AAER-3C
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5504

RE: Docket No. 07-AAER-3: 2008 Rulemaking Proceeding on Appliance Efficiency Regulations

Dear Chairman Rosenfeld and Commissioners:

I am writing in regards to the Draft Efficiency Standards for Televisions, concerning possible unintended effects of certain features of the draft standards, in particular, the effect on small and battery-powered televisions, and the "forced-menu" feature.

Firstly, I respectfully request that you exclude small and battery-powered televisions (including televisions powered from 12VDC automotive supplies) from the draft standards. The draft standards provide little or no benefit for small televisions, as the constant term in the active-state power limits result in a power limit that is, proportionately, very relaxed. Similarly, battery-powered televisions, in addition to being generally small, already need to have low power consumption in order to have acceptable battery life. Thus, the draft standards impose a regulatory burden for compliance with a standard that will not actually improve efficiency.

Furthermore, the labeling requirements for ½ inch-high energy performance markings are not well-suited to very small (e.g., handheld) televisions. Inasmuch as such televisions, for the reasons noted above, are intrinsically low-power, this is another area in which the draft standards impose a burden with no obvious benefit.

Secondly, I respectfully request that you reconsider the "forced-menu" feature. As presently defined, this feature is incompatible with a zero-power "mechanical-off" state, as it will result in annoying the user with a menu every time the television is turned on. While most tabletop televisions use a low-power passive-standby state, portable and battery-powered televisions are likely to want a zero-power off state to avoid depleting the batteries during periods of non-use.

For the same reasons, the "forced-menu" feature is incompatible with the use of smart power strips. In this case, it is possible that the "forced-menu" feature may actually increase energy consumption by discouraging the use of smart power strips and, potentially, other smart-grid devices. A better implementation of "forced-menu" might be to require the menu to appear once, at initial setup, but then allow retaining the display mode in nonvolatile memory, instead of requiring that the menu reappear each time the television is turned on after being disconnected from line voltage.

Furthermore, the value of "forced-menu" or automatic brightness controls for energy conservation is technology-specific. DLP and other projection televisions do not, in general, change their energy consumption with different brightness settings, as the metal halide light source is not generally dimmable. Thus, requiring automatic brightness control or a forced menu selection for them provides no benefit.

Finally, I note a definitional issue. The proposed standards appear to add video projectors, where the screen is not part of the projector, to the definition of a television. Such devices are often used in home-theater installations, but screen size is not a meaningful measure for them, as it is determined by the

installation, and is not known to the manufacturer. While efficiency standards may be desirable for projectors, a size-based standard is inapplicable, and they should be clearly excluded from the proposed standard.

Thank you for the opportunity to comment on the draft standards.

Sincerely yours,

Samuel Ho