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December 12, 2008

Comment: The California Energy Commission's Efficiency Committee
Workshop - Docket # 07-AAER-3C

2008 Rulemaking Proceeding on Appliance Efficiency Regulations

Art Rosenfeld, Commissioner and Presiding Member
Jackalyne Pfannenstiel, Chairman

Dear Commissioner Rosenfeld and Chairman Pfannenstiel:

Agoura Technologies, Inc. supports the TV energy efficiency standards proposals that are being considered by the California Energy Commission. We wish to make you aware of the technology that Agoura Technologies is developing to enable 30% LCD energy savings at cost savings. The Agoura PolarBrite™ technology is a new LCD film technology that will significantly contribute to an LCD manufacturer's ability to meet the proposed Tier 1 and Tier 2 standards. We strongly endorse establishing these standards, as they will drive LCD manufacturer's to adopt new energy savings technologies, such as PolarBrite, particularly when they do not have a cost impact. We expect that every LCD will utilize our technology and the result will be re-baselined LCD energy efficiency that will enable even tighter standards in the future.

Agoura Technologies is a venture-backed, California-based company that is developing and bringing to market a new optical polarizer technology that will lower the active power requirements of LCDs by 30% while decreasing the manufacturing costs. The Agoura PolarBrite technology is a "recycling polarizer" that reclaims light that would otherwise be lost as heat. The recycling functionality is similar to that provided by the referenced 3M Vikuity film, but unlike 3M Vikuity, it is not a costly additional backlight film. It will be very difficult, if not impossible, for an LCD manufacturer to achieve the proposed active mode standard without polarization recycling. The PolarBrite technology is integrated into the LCD panel "rear" polarizer and offered at the same price as being paid today for the "rear" polarizer and therefore will result in a cost savings in not having to use a separate polarization recycling film. In addition, we will enable cost savings in reduced lighting and power supplies.

In the Commission's Staff Draft Report of December 2008, CRTs were listed in Table 3 as the most energy efficient technology type in terms of power usage in average size TVs. However, as we all know, CRT TV's are rapidly being replaced by LCD and Plasma TV's, but at a cost to energy efficiency. When the new Agoura PolarBrite technology is included in LCD TVs, the 30% power reduction will move LCD TVs to be the most efficient of all the technology types.

In current LCDs, the rear polarizer, which is an essential component of LCDs, absorbs more than 50% of the light produced by the backlight. While considerable power is consumed to generate this light, it is irrevocably lost in the rear polarizer. The new rear polarizer technology Agoura will introduce reduces this light loss by more than half and thereby reduces active power consumption by 30%.

We are currently in business development discussions with the major LCD manufacturers and many have received samples of our product. We will be commencing production of the product in small form factors in this next year and successively increasing the form factor to large TV areas within the next 2 years.

We have also been in discussion with the EPA regarding the Energy Star program and would like to work closely with the California Energy Commission to improve the energy efficiency of LCD TV's.

Best regards,



Steve Stephansen
CEO, Agoura Technologies