

February 10, 2014

Comments for Panasonic Corporation of North America

Television Labels, Matter No. R611004

Panasonic is pleased to offer our comments to the U.S. Federal Trade Commission on the Television Labels, Matter No. R611004.

16 CFR Part 305 – Energy and Water Use Labeling for Consumer Products Under the Energy Policy and Conservation Act (“Energy Labeling Rule”)

Scope of Products included in Annual Report:

The Federal Register Vol. 78 Pg. 78308 states:

“(3) Manufacturers of televisions shall submit annually a report containing the brand name; model number; screen size (diagonal in inches); power (in watts) consumed in on mode, standby-passive mode, in standby-active mode, low mode, and off mode; and annual energy consumption (kWh/year) for each basic model in current production.”

Can the FTC please confirm our understanding that this requirement applies only to televisions that are still being manufactured on or after May 1st in the year the report is submitted?

Reported Values versus Measured Values:

Manufacturers often must place orders for the ENERGY GUIDE labels prior to obtaining the final measured power results from third-party certification bodies. The ENERGY STAR program allows manufacturers to submit Reported Values in addition to Measured Values for the product’s power provided that the Reported Values are the same or more conservative (greater power) than the Measured Values. Only the Reported Values are displayed in the ENERGY STAR list of qualified products.

Can the FTC please confirm our understanding that the Reported Values may also be displayed on the Energy Guide label?

Again, Panasonic is pleased to offer our comments on these matters. We would be happy to answer any questions you may have on our comments.

Sincerely,
Mark J. Sharp
Group Manager
Corporate Environmental Department