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Dr. Stephan Kolb
European Commission
Directorate-General for Energy and Transport
Energy Efficiency
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Energy labelling of televisions

Dear Dr. Kolb,

With regard to energy labelling of televisions and its related proposal for the delegated regulation, we as LOEWE have been in contact with the German Federal Ministry of Economics and Technology in order to express our strong concern to the current labelling proposal from March 26th.

As we welcome in principle the Commission progress for the establishment of TV energy labeling, we have contributed to a realistic development of such a scheme already via our European Industry Representation 'DIGITALEUROPE' while taking into account that targets remain achievable. This is one of the reasons, why we support the DIGITALEUROPE request to return to the Commission proposal from February 12th, in order to start with realistic and ambitious targets for a labeling scheme.

Taking into account our own company size, we depend on third parties for purchasing specific components i.e. displays and therefore we are effected by the component quantity we want to purchase, its efficiency in the price segment given and its availability to us as a smaller producer in Germany.

Additionally we would like to point out that as efficiency limits for the larger makers are now near to the best possible to achieve, not all manufacturers are financially capable to develop and invest in core technology to compete. This is especially true for us, the SMEs located in Europe. Furthermore this SME's (Technisat, Metz, LOEWE) have complex functionality added (similar to a complex set-top-box) which did not find any consideration in the working document so far. The new EC proposals will additionally harm the integration of functions to a TV-set.

Because we do understand stakeholder concerns about the potential risk of parallel labels in the market during its first introduction, we would like to provide our own idea of an ambitious scaling in Table 1, which takes into account the current circumstance.

Vorsitzender des
Aufsichtsrates:
Dr. Rainer Hecker
Geschäftsführung:
Frieder C. Löhner
(Vorsitzender)
Gerhard Schaas
Oliver Seidl
Sitz der Gesellschaft:
Kronach
Amtsgericht Coburg:
HRB 641

Table 1:

A+++	$EEI < 0.10$
A++	$0.10 \leq EEI < 0.15$
A+	$0.15 \leq EEI < 0.25$
A	$0.25 \leq EEI < 0.35$
B	$0.35 \leq EEI < 0.50$
C	$0.50 \leq EEI < 0.65$
D	$0.65 \leq EEI < 0.80$
E	$0.80 \leq EEI < 1.00$
F	$1.00 \leq EEI < 1.20$
G	$1.20 \leq EEI$

This advanced scaling should find its consideration also in longer timelines regarding the introduction of new classes.

We do appreciate your understanding of our market situation and offer our availability via the DIGITALEUROPE representation or directly.

Thank you very much in advance.

Yours sincerely

Loewe Opta GmbH

Environmental affairs
development



Dr. Jürgen Pfannenmüller

Director of Product Development



Roland Bohl