



Dr. Stephan Kolb
European Commission
Directorate-General for Energy and Transport
Energy Efficiency
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Geschäftsleitung

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Labelling of TV-Sets

Dear Dr. Kolb,

with regard to energy labelling of televisions and its related proposal for the delegated regulation, we as Metz 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 labelling, 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 labelling scheme.

We turn against your current suggested and distinct aggravation of limit values. Allow us to explain our point of view below:

To our company as well as to other European TV manufacturers which are all medium-sized enterprises, this aggravation will mean a competitive disadvantage compared with globally acting and technologically sophisticated groups. Far-East TV manufacturers, having access to their own panel technology, are gaining key benefits by passing on "leading-edge" technologies to their module customer merely temporally delayed. This will lead to such manufacturers and so-called Global Players being able to earlier launch e.g. new power-saving panel technologies than manufacturers which do not possess their own panel technology. This prevailing temporal delay on occasion of the commercial launch must not, because of an extremely fierce energy labelling, be the reason for endangering the existence of European TV manufacturers which don't have at their disposal an own panel technology. Furthermore we, as a medium-sized company

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are facing restricted development resources and a longer ROI cycle for cabinet tooling costs due to smaller quantities. We consequently are able to implement new panel technologies only consecutively.

We, however, don't want our position to be understood as if we intend to prevent or retard the process of introducing energy labelled TV. We rather argue for a realistic approach that takes into consideration the interests of medium-sized manufacturers adequately. We currently don't see that.

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.

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.

Dear Mr. Kolb, may we eventually once again vividly ask you to plead for the voice of medium-sized TV manufacturers in Germany being heard better when passing the energy labelled TV. On behalf of the job security of our approximately 660 employees, we ask you to consider our proposal.

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

Metz - Werke



Dr. Kotzbauer
Managing Director