

February 10, 2020

The Honorable Bobby L. Rush
Chairman, Subcommittee on Energy
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Fred Upton
Ranking Member, Subcommittee on Energy
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Rush and Ranking Member Upton:

As the Subcommittee on Energy considers energy efficiency legislation, we are contacting you to offer the Consumer Technology Association's (CTA's) support for language in H.R. 3962, The Energy Savings and Industrial Competitiveness Act, which would allow electronics manufacturers to earn relief from burdensome Energy Star product certification requirements after proving consistent compliance.

CTA supports the Energy Star program, and our industry has participated in the program for almost three decades with significant contributions of energy savings. While we support Energy Star, we request a change so our members in more than a dozen categories can participate more deeply in the program.

Third-party certification requirements were implemented by the U.S. EPA in 2011 and now apply to all companies participating in the Energy Star labeling program. This program change was in response to compliance issues for certain products outside of the electronics industry. The electronics industry has consistently maintained a strong record of compliance within the Energy Star program, dating back to the program's inception in 1992. Furthermore, this language would not in any way change marketplace verification of Energy Star compliance, a tool for testing the performance of products off the shelf.

Our industry is defined by short product cycles, intense time-to-market pressures, and relentless innovation. The third-party certification requirement has become increasingly burdensome, requiring additional administrative steps and costs while delaying products entering the market. Because of this, many companies are forced to reevaluate continued participation in the program in certain product categories for which these burdens outweigh the market advantages associated with Energy Star.

Language to address the third-party certification issue, originally introduced by Senators Wicker and Landrieu, provides a balanced approach that maintains EPA's third-party certification authority

but allows electronics manufacturers with a demonstrated track record of full compliance to receive relief from the costly, time-consuming requirements.

Thank you for your consideration, and please do not hesitate to let us know if you have any questions about this important language.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Shapiro". The signature is fluid and cursive, with the first name "Gary" and last name "Shapiro" clearly distinguishable.

Gary Shapiro
President & CEO