

ENERGY STAR® Program Requirements for Set-top Boxes, Final Draft - Version 2.0, March 14, 2008

Line #	Current Language	Alternative Language	Comment/Reason
120-123	Once the Partner submits its first list of ENERGY STAR qualified STB models, the Partner will be listed on the ENERGY STAR Web site.	"...the Partner, at its discretion, may be listed on the ENERGY STAR Web site."	As discussed at the February 1, 2008 Stakeholders meeting, manufacturers who sell directly to service providers rather than through retail channels may not wish to be listed on the ENERGY STAR web site. These manufacturers should have the option of not participating in this aspect of the program.
139-141	The data will be used by EPA only for program evaluation purposes and will be closely controlled. Any information used will be masked by EPA so as to protect the confidentiality of the Partner;	Any information used will be masked and aggregated by the EPA and will not reveal information specific to the Partner, including its customers, its specific industry segment, or its geographic location.	We again respectfully and strongly request the EPA reconsider its previous decision to use its standard language in this area in order to better protect the confidentiality of manufacturers and the service providers participating in this new program. Left unchanged, service providers and manufactures may not participate in the ENERGY STAR program.

202	Cable STB: A STB whose principal function is to receive television signals from a broadband, hybrid/[fiber] coaxial, community cable distribution system and deliver them to a consumer display and/or recording device. Source: CSA C380-06 modified.	Cable STB: A STB whose principal function is to receive television signals from a broadband, hybrid fiber/coaxial, community cable distribution system and deliver them to a consumer display and/or recording device. Source: CSA C380-06 modified.	The correct term should be "hybrid fiber/coaxial..."	
302	"a. the user pushes a power/standby button on the remote or on the unit; or..."	a. the STB receives a notification from the user to enter a sleep state. The notification may be one of a power/standby button press on a remote control or front panel of the unit, or an electronic signal or data packet received via a digital interface on the STB.	The existing language may be interpreted by some to mean that the only way to get the STB into sleep via the user is via the remote or front panel. However there are other options (e.g., HDMI CEC, 1394 AV/C, etc), that are available to put the STB into sleep via the user.	
324	C380-06	C380-08	We understand that the CSA has updated this specification.	
Table 1		Delete Tier 2 Annual Energy Allowances.	We once again strongly and respectfully ask the EPA to eliminate Tier 2 criteria. Given our current set-top roadmaps, service providers cannot meet the Tier 2 criteria as specified by the dates specified. Left unchanged, service providers and manufactures may not participate in the ENERGY STAR program.	

Table 2	DOCSIS	Change the term to "DOCSIS / Out-of-Band Tuners." Change the Annual Energy Allowance from 20 kWh/year to 26 kWh/year.	There is no provision for ANSI/SCTE-55-1 2002 or ANSI/SCTE-55-2 2002 out-of-band tuner technology. The "Additional Tuners" allowance explicitly excludes these technologies, however they MUST be accounted for somewhere. Raising the allowance slightly to 26 kWhr/year will provide the necessary energy allowance for the out-of-band tuner technologies used in set-top boxes, including DOCSIS, ANSI/SCTE-55-1 2002 or ANSI/SCTE-55-2 2002.	
Table 2	Home Network Interface	Change the Annual Energy Allowance from 20 kWh/year to 35 kWh/year.	20 kWh/year is insufficient to account for the energy contribution of a home network interface such as MoCA and WiFi. We request that the EPA raise this allowance to sufficiently accommodate the energy contribution of the Home Network Interface.	
Table 2		Delete Tier 2 Annual Energy Allowances.	See comment #10 above.	

Table 2		Change the Annual Energy Allowance for Additional Tuners from 53 kWh/year to 35 kWh/year, and add a footnote clarifying that the annual energy allowance for Additional Tuners is a <i>per tuner</i> allowance.	The existing text is ambiguous as to whether the allowance is applied to one or all tuners. We feel the allowance should apply to each tuner and recommend lowering the allowance to account for this approach.	
457-463	To qualify, the external power supply (EPS) used with newly-qualified STBs must be ENERGY STAR qualified or meet the no-load and active mode efficiency levels provided in the ENERGY STAR Program Requirements for Single Voltage Ac-Ac and Ac-Dc External Power Supplies, Version 2.0. The ENERGY STAR specification and qualified product list can be found at: www.energystar.gov/powersupplies . Refurbished or reconfigured STBs that can meet the energy efficiency performance requirements in the ENERGY STAR STB specification do not need to use an ENERGY STAR qualified (or equivalent) EPS.	To qualify, the external power supply (EPS) used with STBs manufactured after the effective date of this document must be ENERGY STAR qualified or meet the no-load and active mode efficiency levels provided in the ENERGY STAR Program Requirements for Single Voltage Ac-Ac and Ac-Dc External Power Supplies, Version 2.0. The ENERGY STAR specification and qualified product list can be found at: www.energystar.gov/powersupplies . STBs manufactured prior to the effective date of this document that can meet the energy efficiency performance requirements in the ENERGY STAR STB specification do not need to use an ENERGY STAR qualified (or equivalent) EPS.	To further clarify that legacy/existing/deployed STBs that meet the Tier 1 values with their existing power supplies are not required to use an external power supply that meets the criteria for a new STB.	

476-478	This allowance may only be used for STBs that can provide independent content to more than one TV.	This allowance may only be used for STBs that can provide independent content to more than one display device (e.g., TV, PC, portable media player, etc.).	The term "TV" constrains the implementation. With protocols such as UPnP, DLNA, HANA, etc., there are many devices other than a TV that can render content delivered by a STB over a home network. Multi-Room STBs should not be constrained to only working with TVs	
480-483	First, test the multi-room STB and compare the results to the specification criteria assuming the STB will deliver content to only one TV, i.e., do not include the Multi-Room allowance. If the STB passes, then it qualifies as an ENERGY STAR qualified STB under any installation configuration, i.e., it can be used for one or more TVs.	First, test the multi-room STB and compare the results to the specification criteria assuming the STB will deliver content to only one display device, i.e., do not include the Multi-Room allowance. If the STB passes, then it qualifies as an ENERGY STAR qualified STB under any installation configuration, i.e., it can be used for one or more display devices.	The term "TV" constrains the test implementation. With protocols such as UPnP, DLNA, HANA, etc., there are many devices other than a TV that can render content delivered by a STB over a home network.	
493-495	If the STB qualifies as a Multi-Room STB, manufacturer must clearly indicate in product literature that product only qualifies for ENERGY STAR when providing content to more than one TV.	If the STB qualifies as a Multi-Room STB, manufacturer must clearly indicate in product literature that product only qualifies for ENERGY STAR when providing content to more than one display device.	The term "TV" constrains the test implementation. With protocols such as UPnP, DLNA, HANA, etc., there are many devices other than a TV that can render content delivered by a STB over a home network.	

507-508	Devices that provide for speculative recording must have an easy to reach menu option allowing the user to disable this feature at will.	Devices that provide for speculative recording must have an user accessible menu option allowing the user to disable this feature at will.	The term "...easy to reach..." is ambiguous. What constitutes "easy to reach"? The EPA likely does not want to be placed in the position of determining whether a particular manufacturer's user interface is easy to reach.	
515	"The test results produced by the ENERGY STAR test procedure (AKA; modified CSA 380-06)..."	"The test results produced by the ENERGY STAR test procedure CSA 380-06..."	The correct reference is C380-08.	
709-716	"...appropriateness of other Tier 2 criteria at least nine months prior to the Tier 2 effective date."	"...appropriateness of other Tier 2 criteria at least 16 months prior to the Tier 2 effective date."	We feel the additional time is warranted, particularly given the large discrepancy between values contained in Tier 1 and Tier 2 currently contained in the document	

ENERGY STAR® Program Requirements for Cable, Satellite, and Telecom Service Providers, Final Draft - Version 1.0, March 14, 2008

Line #	Current Language	Alternative Language	Comment/Reason
62-65	Purchase Requirement: ensure that 50% of all new STB purchases in a calendar year (e.g., 2009 and 2010) are ENERGY STAR qualified. "New purchases" are counted in the year in which the Service Provider takes delivery. STBs refurbished to meet ENERGY STAR can not be counted towards the purchase requirement.	Purchase Requirement: ensure that 50% of all new STB purchases in a calendar year (e.g., 2009 and 2010) are ENERGY STAR qualified. "New purchases" are counted in the year in which the Service Provider takes delivery. STBs refurbished to meet ENERGY STAR may be counted towards the purchase requirement at the service provider's option.	The requested changes would retain the EPA's previous language and allow refurbished boxes to be counted towards the 50% threshold (assuming they meet the necessary requirements), providing service providers with a further incentive to upgrade existing products where possible.
69-70	Fleet Requirement: ensure that at least 15% of all STBs used by subscribers during 2009 (30% of all STBs used by subscribers during 2010) are ENERGY STAR qualified.	Fleet Requirement: ensure that at least 10% of all STBs used by subscribers during 2009 (15% of all STBs used by subscribers during 2010) are ENERGY STAR qualified.	We feel the revised percentages represent a more attainable goal within the timeframe specified.
201-203	The data will be used by EPA only for program evaluation purposes and will be closely controlled. Any information used will be masked by EPA so as to protect the confidentiality of the Partner.	Any information used will be masked and aggregated by the EPA and will not reveal information specific to the Partner, including its customers, its specific industry segment, or its geographic location.	See comment #6 above.

427-461		Delete section.	Service providers do not have the equipment, facilities, nor human resources available to perform the same tests conducted by their manufacturer. Consistent with a previous position on this topic, we again feel the requirement placed on cable service providers to re-test a set-top box for ENERGY STAR® compliance after it has been previously qualified by the manufacturer is unnecessary. It is sufficient for service providers to rely on the manufacturer's statement of compliance.	
472-474	EPA will reevaluate the appropriateness of this percentage for 2010 and 2011, when Tier 2 becomes effective and there is more information on the likely availability of qualifying products.	Delete text	Manufacturers and service providers will be unable to meet the Tier 2 requirements as currently defined.	