



November 16, 2006

Mr. Milton Brown
Office of the Chief Counsel
National Telecommunications and
Information Administration
1401 Constitution Avenue
Room 4713
Washington, DC 20230

Dear Mr. Brown:

On November 15, 2006, The Association for Maximum Service Television, Inc. (“MSTV”), the Consumer Electronics Association (“CEA”) and the National Association of Broadcasters (“NAB”) (collectively, the “Joint Industry Commenters”) met with staff of the National Telecommunications and Information Administration (“NTIA”). Also joining the Joint Industry Commenters by teleconference was Noah Horowitz, of the Natural Resources Defense Council (“NRDC”).

During the meeting, the Joint Industry Commenters discussed portions of their filing to NTIA on September 25, 2006, representing a landmark collaboration to advance the nation’s transition to all-digital television broadcasting. Specifically, they emphasized the five core principles, as outlined in the filing:

- **Continued Consumer Access to the Broadcast Service.** The associations state that the DTA coupon is not a subsidy program; it is a consumer reimbursement program. NTIA’s administration of the program must effectively ensure continuity of service to existing analog television sets.
- **Availability of High Quality, Usable, Low-Cost Converter Boxes.** Consumers’ out-of-pocket expenses for DTA converters must be minimized and the converter boxes must be intuitive and work properly in the myriad of challenging installation configurations in which they will be placed.
- **Simplicity and Clarity.** NTIA’s administration of the program must strive for simplicity. For consumers and others involved, the program must also be easy to understand and follow.
- **Fairness and Prevention of Waste and Abuse.** The program should be structured to facilitate equitable distribution of coupons to all Americans with analog televisions that depend on over-the-air broadcasts. The program should also be structured to prevent abuses and waste and deter fraudulent attempts to obtain program benefits.

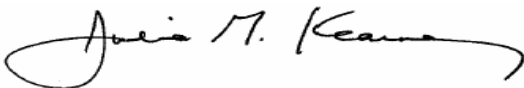
- **Cooperation.** The government, broadcasters, manufacturers, and retailers must each contribute to the above goals by providing consumers with the tools and information necessary to make effective use of the converter box program.

In addition, the Joint Industry Commenters discussed technical requirements, as proposed in Appendix A of the filing. The Joint Industry Commenters also discussed the conformity assessment process and the need for a “verification plus” process based on the FCC’s present, well-established and well-understood verification procedures, as described in the joint filing. The group also emphasized that functions such as electronic program guide navigation and “smart antenna” interfaces should not preclude converter boxes from obtaining approval under NTIA’s program, which also was discussed in the filing.

As stated in their filing, The Joint Commenters underscored their commitment to contributing to the success of the program by engaging in extensive consumer outreach.

Finally, The Joint Commenters discussed their request, made with NRDC and the Consumer Electronics Retailers Coalition (“CERC”), that coupon-eligible digital-to-analog converter boxes meet two watt standby power limits and include an auto-power-down feature in order to be eligible for the coupon program. A copy of the proposal is attached hereto.

Respectfully submitted,



Julie M. Kearney
Senior Director and Regulatory Counsel
Consumer Electronics Association

cc: Ms. Anita Wallgren
Mr. David Murray
Mr. Tony Wilhelm
Mr. William Cooperman
Mr. Charles Mellone, Jr.



Consumer Electronics Retailers Coalition



October 25, 2006

The Honorable John M. R. Kneuer
Acting Assistant Secretary of Commerce for
Communications and Information
National Telecommunications and Information Administration
United States Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Subject: **Joint Stakeholder Request that Coupon-Eligible Digital-to-Analog Converter Boxes Meet Two Watt Standby Power Limit and Include Auto-Power-Down Feature**

Dear Mr. Kneuer:

Pursuant to the NTIA's recent request for public comments on the implementation and administration of a coupon program for digital-to-analog converter boxes, several parties submitted comments that addressed whether NTIA should include energy considerations in its performance standards. Since the conclusion of the public comment period last month, the undersigned major stakeholders have reached an agreement which takes advantage of an important opportunity for energy savings and avoids state-level regulation of converter boxes potentially detrimental to the nation's transition to digital television. This letter, which supersedes our earlier comments regarding energy considerations, outlines and explains our joint request to NTIA regarding the coupon program and energy use performance standards.

We urge the NTIA to adopt the following minimum energy use requirements for converter box eligibility:

1. Converter box equipment shall use no more than two watts of electricity in "Sleep" state, and
2. Converter box equipment shall meet the auto power down requirement as described below.

Eligible equipment shall provide the capability to automatically switch from the On state to the Sleep state after a period of time without user input. This capability shall be enabled at the factory as the default setting for the device. The default period of inactivity before the equipment automatically switches to the Sleep state shall be four hours. Eligible equipment may allow the current program to complete before switching to the Sleep state.

The default energy related settings shall not be altered during the initial user set-up process and shall persist unless the user chooses at a later date to manually: (a) disable the "automatic switching to Sleep state" capability, or (b) adjust the default time period from 4 hours to some other value.

Sleep state power use shall be measured in accordance with industry standard CEA 2013-A. For purposes of determining compliance, power levels and features may be asserted as follows:

- Sleep state power – Press the power button on the equipment or the remote control 10 minutes after the equipment has been turned on, and
- Auto power down – Determine that the equipment is in Sleep state four hours and twenty minutes after the equipment has been turned on. During this test period, no user activity is allowed (i.e. remote control input, etc.) and no changes may be made to the energy related factory settings.

We continue to support the Environmental Protection Agency's Energy Star program for digital-to-analog converter boxes and are separately requesting that EPA pursue specifications that maintain the program's traditional voluntary nature and focus on top-tier energy performers. Specifically, for converter box Energy Star qualification, we are urging EPA to specify eight watts in On state, one watt in Sleep state, and auto power down.

Thank you for your prompt attention to and consideration of our joint request which we believe fully addresses energy use performance standards as they relate to converter boxes and the coupon program.

Sincerely,

Douglas Johnson, Brian Markwalter &
Julie Kearney
CONSUMER ELECTRONICS ASSOCIATION
(703) 907-7600

Marc Pearl
CONSUMER ELECTRONICS RETAILERS
COALITION
(202) 263-2585

David Donovan
THE ASSOCIATION FOR MAXIMUM SERVICE
TELEVISION, INC.
(202) 966-1956

Marsha J. MacBride, Valerie Schulte &
Lynn D. Claudy
NATIONAL ASSOCIATION OF
BROADCASTERS
(202) 429-5415

Noah Horowitz
NATURAL RESOURCES DEFENSE COUNCIL
(415) 875-6100