



National Cable & Telecommunications Association
25 Massachusetts Avenue, NW
Suite 100
Washington, DC 20001-1431
(202) 222-2300

Science & Technology
(202) 222-2475
(202) 222-2476 Fax

April 4, 2008

Ms. Katharine Kaplan
ENERGY STAR Product Manager
Consumer Electronics and Office Equipment
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR® Program Requirements for Set-top Boxes

Dear Ms. Kaplan:

On behalf of the National Cable & Telecommunications Association (“NCTA”), I am responding to the request by the Environmental Protection Agency (“EPA”) for comments from industry stakeholders on the ENERGY STAR® Program Requirements for Set-top Boxes. NCTA is the principal trade association for the U.S. cable television industry, representing cable operators serving more than 90 percent of the nation's cable television households, more than 200 cable program networks, and suppliers of equipment, including set-top boxes, and services to the cable industry.

NCTA supports a voluntary federal program designed to promote the manufacture and use of more energy-efficient set-top boxes and welcomes the opportunity to submit the attached detailed comments and recommendations on the latest versions of the ENERGY STAR® Program Requirements documents to the EPA in an effort to assist in the ongoing development of the program.¹ Our comments and recommendations in spreadsheet format (attached) address a number of areas of concern to the cable industry, including the energy allowances for DOCSIS and home network interfaces; service provider purchase and fleet requirements; Tier 2 requirements; and service provider testing requirements. NCTA looks forward to working with the EPA to help resolve these concerns prior to publication of the final version of the ENERGY STAR® Program Requirements for Set-top Boxes.

* * * * *

¹ ENERGY STAR® Program Requirements for Cable, Satellite, and Telecom Service Providers, Partner Commitments, Final Draft – Version 1.0, March 14, 2008, and ENERGY STAR® Program Requirements for Set-top Boxes, Final Draft, Version 2.0, March 14, 2008.

We believe the comments and suggestions we have offered help establish reasonable criteria that will allow cable service providers and manufacturers to make improvements in product energy efficiency. Should you have any questions or seek additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Andy". The signature is written in a cursive, flowing style.

Andy Scott
Vice President of Engineering

cc: Darcy Martinez, ICF International

Attachment