

Katharine,

I have outlined below feedback relative to the Energy Star Draft 2.0 program requirements for set-top boxes dated October 5, 2007. We appreciate the opportunity to participate and provide feedback in this process.

Table 1 - Base Functionality:

a) Since the majority of our set-tops shipping today require the use of a CableCARD to even function, an additional power requirement needs to be added to the allowance in Table 1 for the Cable category.

Table 2 - Additional Functions Annual Energy Allowance

a) Add additional allowances for DOCSIS functionality, with the ability to allow for future growth where channel bonding (utilizing multiple tuners) will be a capability in the set-top.

We recommend that there be an allowance of 35 kWh/yr per DOCSIS tuner.

b) Add additional allowance for "home networking" capability in the set-top. We recommend that there be an allowance of 39 kWh/yr for home networking.

General Comments:

We strongly believe that the draft target values and timing of the Tier 2 Annual Energy Allowances are not realistic at this time. While we agree that progress on energy efficiency can be made in the near future and we are working towards making our products more energy efficient, we also believe that the development, integration, system testing, and real world beta testing required to achieve significant changes in energy usage cannot be enacted in the timeframe or in the manner suggested in the Draft Tier 2 requirements. We respectfully suggest that further discussion take place regarding the Tier 2 timing and values.

Clarification Regarding the Definition of IPTV Set-top Boxes

An IP set-top is a television set-top converter which has its Audio/Video services delivered via Internet Protocol (TCP/IP) transport.

i. Various delivery networks may be used to deliver the IP data (Ethernet, HPNA, MoCA, xDSL, Fiber, 802.11, Powerline Carrier/HomePLUG AV, DOCSIS, etc)

ii. Various other interfaces can exist on the IP STB for external device connectivity

Hybrid versions of an IP Set-top can also include tuners which facilitate A/V service delivery via QAM/DAVIC transport.

i. In this case the Hybrid IP set-top can process both IP delivered content and HFC QAM/DAVIC delivered content

