



Working Together, Advancing Efficiency

April 4, 2008

Katharine Kaplan
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
MC 6202J
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency, I am submitting the following comments on the ENERGY STAR set-top box (STB) criteria. These comments were developed by the CEE Consumer Electronics Committee after a review of the Final Draft ENERGY STAR Program Requirements issued on March 14, 2008. Thank you for the opportunity to provide input. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE would like to express its continuing support for an ENERGY STAR specification for set-top boxes. These products are among the most consumptive electronics products in the home and they represent a large opportunity for capturing energy savings. CEE members are currently exploring program approaches for energy-efficient set-top boxes.

Given the rapid innovation in this product category, we recognize the value to all stakeholders—particularly manufacturers—in predetermining a date for a new “Tier 2” specification level. We support this practice to the extent that the timing and level of the Tier 2 specification are consistent with the intended market meaning of ENERGY STAR at the time the new specification level takes effect.

In our last comments, we stated our support for measures that ENERGY STAR, manufacturers, and service providers may employ to decrease the energy use of STBs. We noted several opportunities including set-top box redesigns, software upgrades, and consumer management of box settings (e.g., enabling consumers to select less frequent or fewer downloads). We note that this Final Draft requires devices that provide speculative recording to have an easy to reach menu option to disable this feature (line 505). We encourage EPA to carefully consider whether enabling consumers to manage other download options would yield additional energy savings.

Thank you again for the opportunity to provide these comments. We look forward to working with EPA and other stakeholders in the future. If you have any questions about them, please direct them to Margie Lynch, Program Manager, at (617) 589-3949 ext. 231.

Sincerely,

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

Marc Hoffman
Executive Director

CONSORTIUM FOR ENERGY EFFICIENCY

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Supporting Organizations

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Efficiency Vermont

Long Island Power Authority

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Northeast Energy Efficiency Partnerships

Northwest Energy Efficiency Alliance

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Sacramento Municipal Utility District

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