Some brief comments on draft 3

Noah has sent me a copy of his comments, most of these we would agree with. However we would prefer to keep the current artificial duty cycle, which will be wrong in almost every case but will be right on average, as this gives a constant repeatable measurement technique.

The tier 2 limits are aggressive, and as such should remain in the document, but it is important to liase with manufacturers before the limits come into force to determine if the latest silicon and software is capable of complying with tighter limits, if not the limits need to be changed or the date of effect of Tier 2 delayed

The ability to go back into sleep mode after a service provider triggered event is important, but should not be mandated to be within 1 minute, as this event may include revalidation of the CA system. It is important that a user (hacker) cannot get easy access to the CA data as this will make it much simpler to crack the CA system, a time frame of 15 minutes would be preferred

We agree with the comments from Noah on speculative or push VOD. For pure energy efficiency it would be better if these were not permitted, however these are seen as important by the service providers, so the ability for the end user to disable this function is seen as advantageous.

We would agree it is essential for the ES status of a STB to be linked to a service provider, as different providers use different middleware and application layer software which can affect the ES status of the box.

In addition we are concerned that service providers will be allowed to join the ES scheme and gain the positive publicity in April, 8 months before it can be known whether it will be possible to purchase the 50% ES qualified products.

We note that the draft 3 does not include any allowance for DOCSIS modems, without an allowance it will not be possible for high end cable products to be ES compliant

For labelling we would suggest that it would be relatively simple to display the ES logo when notifying of auto sleep. The display of the ES logo at start-up is more contentious