



November 14, 2007

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

Dear Katharine:

On behalf of CEE, 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 (Committee) after a review of the Draft 2 ENERGY STAR Program Requirements issued on October 5, 2007. 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.

Program Requirements for Cable, Satellite, and Telecom Service Providers

CEE strongly supports EPA's proposed approach to include participation of cable, satellite, and telecom service providers in the ENERGY STAR set-top box program. Specifically, we applaud EPA's proposal to require providers to purchase and deploy an increasing percentage of qualified boxes starting in 2009, as we believe it will help to transform the market for more efficient technologies. Due to the fact that Tier 2 efficiency requirements are scheduled to take effect on January 1, 2010, we suggest the following purchase and deployment levels:

- 25% of ENERGY STAR-qualified STBs to subscribers by January 1, 2009 (Tier 1)
- 25% of ENERGY STAR-qualified STBs to subscribers by April 1, 2010 (Tier 2)
- >25% of ENERGY STAR-qualified STBs to subscribers by April 1, 2011 (Tier 2)

CEE also supports EPA's efforts to ensure that qualified STBs will deliver savings over their entire lifetimes. We suggest a clarification to the statement regarding testing and the "head end" on page 1, line 37. The specification requirements should capture changes in both patterns of updating STBs and additional feature sets that may increase active use. As such, we recommend that the phrase "based on current production capabilities" be added.

As we have noted in the past, we believe it is important to the success of the program that consumers know that they have received an ENERGY STAR-qualified STB. We support a labeling requirement for cable, satellite, and telecom service providers, because these entities play an essential role in ensuring that physical or electronic labeling provided by the manufacturer is intact when the STB reaches the consumer.

The tracking of market penetration and other impacts related to ENERGY STAR and efficiency program success are of critical importance to CEE. We strongly support the deployment data reporting requirements in the draft specification. In addition, we urge EPA to require—not "encourage"—deployment data to be segmented by "meaningful product characteristics." One characteristic we recommend is the categorization of a qualified STB as "simple" (base

functionality only) or “advanced” (with additional functionalities), as this characteristic has significant energy use implications. This is especially important because we understand that “advanced” boxes will comprise an increasing percentage of the market over time. We recommend that this be added to the manufacturer shipment data reporting requirements as well.

Program Requirements for Set Top Boxes

Upon review of the draft ENERGY STAR STB Program Requirements and the draft ENERGY STAR Television Program Requirements, CEE noted that the definition of the standby mode and the amount of time that each product is allowed to remain in this mode are inconsistent. We recommend that EPA carefully consider this issue and aim for consistency across product categories whenever possible.

In addition, CEE seeks clarification regarding the allowance for program and system information or private data (PSIP) scanning, which is given on page 12. Under heading E, “Electronic Program Guide and System Update Requirements” the STB is allowed to exit the standby mode for no longer than one hour in an eight hour period. Under heading F, “Auto Power Down and Other Standby Event Requirements” the STB can exit the standby mode for no longer than two hours in a 24 hour period. CEE asks that EPA clarify these allowances.

Finally, CEE asks EPA to explain how new functionalities, which are not identified in Table 2 on page 9, will be addressed by the specification. For example, if a new energy-using functionality is developed and employed, would it need to be incorporated in the base allowance? A clarification of this point will be essential for this fast-changing product category.

Thank you again for the opportunity to provide initial comments. CEE looks forward to continuing our participation in this specification development process. If you have any questions about these comments, please direct them to Margie Lynch, Program Manager, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

BC Hydro
Natural Resources Canada
NSTAR Electric
Pacific Gas & Electric
San Diego Gas & Electric
Wisconsin Focus on Energy
Xcel Energy