

ENERGY STAR® Program Requirements for Set-top Boxes, DRAFT 3 - Version 2.0, January 14, 2008

Line #	Current Language	Alternative Language	Comment/Reason
89-91	The ENERGY STAR mark must be displayed as part of the auto power down notification, or at another event/location proposed by partner and approved by EPA in advance of distribution to consumers.	Recommend deleting this text.	Given the numerous customer education and notification requirements already contained with the service providers agreement, we believe it sufficient to display the ENERGY STAR mark at power up. This is also consistent with other ENERGY STAR product requirements.
126-129	Once the Partner submits its first list of ENERGY STAR qualified set-top box models, the Partner will be listed on the ENERGY STAR Web site. Partner must provide annual updates in order to remain on the list of participating product manufacturers;	"...the Partner, at its discretion, may be listed on the ENERGY STAR Web site."	This language change would take into account manufacturers who sell directly to operators rather than through retail channels and may wish not to be listed on the ENERGY STAR web site.
139-141	The data will be used by EPA only for program evaluation purposes and will be closely controlled. Any information used will be masked by EPA so as to protect the confidentiality of the Partner;	Any information used will be masked and aggregated by the EPA and will not reveal information specific to the Partner, including its customers, its specific industry segment, or its geographic location.	We respectfully request the EPA reconsider its decision to use its standard language in this area in order to better protect the confidentiality of manufacturers and the service providers participating in this new program.

199		Move the definition of Gateway STB from lines 290 & 291 to this section. Modify the definition as follows: "Gateway STB: A STB that meets the definition for Cable, Satellite, IP or Terrestrial STB above and is capable of providing independent content to multiple TVs. For purposes of these requirements, a Gateway STB also includes an Optical Network Terminal (ONT) STB used by some service providers."	If the recommendation to remove Gateway as an additional functionality and add it to Table 1 as a base functionality as suggested in comment # 16 below is accepted, this change is needed to place the definition in the proper location in the document. The recommendation to modify the definition helps make clear that the allowance for a Gateway device applies all service providers using a fiber optic/coaxial architecture, including those that use Optical Termination Network Terminal STBs.	
206-208	Cable STB: A STB whose principal function is to receive television signals from a broadband, hybrid/[fiber] coaxial, community cable distribution system and deliver them to a consumer display and/or recording device. Source: CSA C380-06 modified.	An STB whose principal function is to receive television signals from a broadband, fiber/hybrid/coaxial, community cable distribution system...	Clearer definition.	

237		<p>H. <u>Out Of Band Transport</u>: Society of Cable Telecommunications Engineers (SCTE) standards (ANSI/SCTE 55-1 2002 and ANSI/SCTE 55-2 2002) that define interface requirements used to gain access to data channels outside of the audio/video source signal over broadband, fiber/hybrid/coaxial, community cable distribution systems.</p>	<p>If the recommendation to include the DOCSIS/SCTE-55 allowance in Table 1 as suggested in comment # 14 below is accepted, this additional definition is needed to replace the removal of the OOB definition from the Additional Functionalities section of the requirements (lines 278-282).</p>	
240-242	<p>Base Functionality: For purposes of this specification, the primary functionality that defines the criteria that apply to a STB. The Base Functionality is one of the following: Cable, Satellite, IP, Terrestrial or Thin-Client/Remote.</p>	<p>Base Functionality: For purposes of this specification, the primary functionality that defines the criteria that apply to a STB. The Base Functionality is one of the following: Cable, Satellite, IP, Terrestrial, Thin-Client/Remote, or Gateway.</p>	<p>If the recommendation to remove Gateway as an additional functionality and add it to Table 1 as a base functionality as suggested in comment # 16 below is accepted, this change is needed to add Gateway to the list of Base Functionality.</p>	
247	<p>"....Player/Recorder, Gateway, and Cable Card."</p>	<p>"....Player/Recorder, and Cable Card."</p>	<p>If the recommendation to remove Gateway as an additional functionality and add it to Table 1 as a base functionality as suggested in comment # 16 below is accepted, this change is needed to remove Gateway from the list of Additional Functionalities.</p>	

278-282	<p>P. Out-Of-Band Tuners: Tuners compliant with standards ANSI/SCTE 55-1 2002 and ANSI/SCTE 55-2 2002 and other similar types of technologies used to gain access to data channels outside of the audio/video source signal. These may facilitate two-way communication and allow the box to send diagnostic information back to the Service Provider as well as enabling Pay-Per-View content and other rich media interactive content.</p>	<p>Recommend deleting this text.</p>	<p>If the recommendation to include the DOCSIS/SCTE-55 allowance in Table 1 as suggested in comment # 14 below is accepted, this definition should be removed.</p>	
Table 1		<p>Change the annual energy allowance for Cable from 70 kWhr/year to 96 kWhr/year.</p>	<p>Adding an additional 26 kWhr/year will provide the necessary energy allowance for the out-of-band tuner technologies used in set-top boxes. These technologies include DOCSIS, ANSI/SCTE-55-1 2002 or ANSI/SCTE-55-2 2002.</p>	
Table 1		<p>Recommend deleting Tier 2 Annual Energy Allowances.</p>	<p>We respectfully ask the EPA to reconsider its decision to retain Tier 2 criteria. Given our current set-top roadmaps, we cannot meet the Tier 2 criteria by the dates specified. We again request that Tier 2 compliance be eliminated from the requirements.</p>	

Table 2		Remove Gateway as an additional functionality and add it to Table 1 as a base functionality.	As currently defined a Gateway device will be closely coupled with a thin client/remote to serve content to multiple TVs. We feel this is essentially another box type that more logically belongs in Table 1.	
Table 2		Add additional allowances to Table 2 for the Gateway based on the functionality it supports. We suggest separate allocations for video, voice and high-speed data. (kWhr/year allocations for each TBD).	Gateways will provide not only video to multiple TVs but also voice and high-speed data. We were not able to provide specific recommendations on the kWhr/year allocations by comment deadline, but are researching these values further and will be able to provide this detail to the EPA at a later date.	
Table 2		Add a "Home Network Interface" category to Table 2 and assign a value of 35 kWh/year under the Tier 1 column. Add a note indicating that this allowance does not apply to Gateway devices. Add a definition for Home Network Interface under Additional Functionalities (text TBD).	To account for the energy contribution of a home network interface, such as MoCA and WiFi that are used in non-Gateway set-top boxes.	
Table 2		Recommend deleting Tier 2 Annual Energy Allowances.	See comment #15 above.	

Table 2		Change the Annual Energy Allowance for Additional Tuners from 53 kWh/year to 35 kWh/year. Add footnote clarifying that the annual energy allowance for Additional Tuners is a <i>per tuner</i> allowance.	The existing text is ambiguous as to whether the allowance is applied to one or all tuners. We feel the allowance should apply to each tuner and recommend lowering the allowance to account for this approach.	
652-654	If this occurs, the STB may exit the Sleep mode for no longer than two hours in a twenty-four (24) hour period that the device would otherwise remain in Sleep mode.	If this occurs, the STB may exit the Sleep mode for no longer than an average of two hours in a twenty-four (24) hour period that the device would otherwise remain in Sleep mode.	This change will afford the manufacturer some flexibility when in rare instances a set-top's peak time exceeds 120 minutes.	

ENERGY STAR® Program Requirements for Cable, Satellite, and Telecom Service Providers, DRAFT 3 - Version 1.0, January 14, 2008

Line #	Current Language	Alternative Language	Comment/Reason
21-21	"... and 50% of all new boxes deployed to subscribers within a calendar year are Energy Star qualified;..."	"... and 50% of all newly purchased boxes deployed to subscribers within a calendar year are Energy Star Qualified;"	To clarify that the deployment percentage applies to newly purchased ENERGY STAR-compliant devices.
23-25	EPA will reevaluate the appropriateness of this percentage for 2010 and 2011, when Tier 2 becomes effective and there is more information on the likely availability of qualifying products.	Suggest eliminating this text	Manufacturers and service providers will be unable to meet the Tier 2 requirements as currently defined.
56-58	This is confirmed by testing for ENERGY STAR qualification while the product is connected to the head end, either at the live head end or at representative head end in a laboratory.	This is confirmed by testing for ENERGY STAR qualification while the product is connected to the system, either on a live system or at representative system in a laboratory.	The requested change removes the ambiguity that the device need be tested literally at a headend.
78-80	If this occurs, the STB may exit the Sleep mode for no longer than two hours in a twenty-four (24) hour period that the device would otherwise remain in Sleep mode.	If this occurs, the STB may exit the Sleep mode for no longer than an average of two hours in a twenty-four (24) hour period that the device would otherwise remain in Sleep mode.	This change will afford the service provider some flexibility when in rare instances a set-top's peak time exceeds 120 minutes.

100-102	The ENERGY STAR mark must be displayed as part of the auto power down notification, or at another event/location proposed by partner and approved by EPA in advance of distribution to consumers.	Suggest eliminating this text	Given the numerous customer education and notification requirements contained with the service providers agreement, we believe it sufficient to display the ENERGY STAR mark at power up. This is also consistent with other ENERGY STAR product requirements.	
107	2. via a permanent or temporary label on product	Add footnote stating "For boxes already deployed, distribution of labels by a service provider shall satisfy this requirement regardless of whether a consumer has affixed such label."	To clarify that service providers are not expected to send service personnel to customer locations to ensure that labels are affixed.	
148-150	The data will be used by EPA only for program evaluation purposes and will be closely controlled. Any information used will be masked by EPA so as to protect the confidentiality of the Partner.	Any information used will be masked and aggregated by the EPA and will not reveal information specific to the Partner, including its customers, its specific industry segment, or its geographic location.	We respectfully request the EPA reconsider its decision to use its standard language in this area in order to better protect the confidentiality of manufacturers and the service providers participating in this new program.	

37-40	<p>Refurbished or reconfigured STBs (i.e. "legacy boxes") may be counted toward the purchase and deployment requirement if they meet the same energy efficiency requirements noted for new STBs. The service provider must test a representative sample of the refurbished STBs following the test procedure provided in ENERGY STAR Program Requirements for Set-top Boxes – Version 2.</p>	<p>"Refurbished or reconfigured STBs (i.e. "legacy boxes") may be counted toward the purchase and deployment requirement if they meet the same energy efficiency requirements noted for new STBs. An external power supply utilized on reconfigured or refurbished STBs already deployed in the field are exempt from the external power supply requirements defined in Section 3-E of the ENERGY STAR Program Requirements for Set-top Boxes. The service provider must test a representative sample of the refurbished STBs following the test procedure provided in ENERGY STAR Program Requirements for Set-top Boxes - Version 2."</p>	<p>To clarify that service providers are not expected to replace legacy external power supplies for legacy set-tops that could otherwise be reconfigured to meet Tier 1 criteria.</p>	
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