



Consumer Electronics Association

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October 20, 2006

Ms. Mehernaz Polad
ICF International
1725 I St., N.W., Suite 1000
Washington, DC 20006

Subject: Comments on Specification Framework Document for DTAs

Dear Ms. Polad:

On behalf of the Consumer Electronics Association (CEA), I am writing in response to the Environmental Protection Agency's request for comments on its Energy Star specification framework document for digital-to-analog converter boxes (DTAs).

CEA represents more than 2,100 companies involved in the design, development, manufacturing, distribution and integration of audio, video, in-vehicle electronics, wireless and landline communications, information technology, home networking, multimedia and accessory products, as well as related services that are sold through consumer channels. CEA and its members have a particular interest facilitating our nation's transition to digital television, the success of which is critical to consumers as well as to consumer electronics manufacturers and retailers.

CEA recognizes and supports Energy Star as a national, market-oriented program that offers a competitive incentive for energy savings. CEA looks forward to working with EPA to develop an Energy Star specification for DTAs.

Proposed energy-efficiency specifications

CEA supports the modal approach described in the EPA's framework document. DTAs do not appear to be complex enough to warrant a duty cycle approach, nor is there sufficient time to conduct the research necessary to create such an approach. CEA expects to be able to comment more specifically on the modal approach at the October 25th workshop.

Test procedure

As discussed at the July 2006 workshop, CEA urges EPA to adopt the test procedures for DTAs as contained in the CEA 2013-A standard for "Standby Passive (Sleep)" mode and the companion standard for "On" mode that is currently in development.

Power consumption of DTAs

As EPA correctly acknowledges, DTAs are not yet on the market in the U.S., nor have the minimum performance requirements been officially defined. Moreover, as stakeholders explained during the EPA's July 2006 workshop, digital-to-analog converters are not uniform in function or features from one national or regional market to another.

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It is unfortunate that EPA has attempted to prognosticate baseline energy consumption and electricity cost based on one stakeholder's input in the absence of products and measurements. CEA believes that publishing estimates of "as much as 17 watts" for power draw and proceeding to derive an annual energy consumption figure of 149 kWh/year distracts from the task at hand. Moreover, EPA's assertion of specific energy savings due to auto power down is based on these same upper-bound estimates for On and Standby Passive Mode power consumption with an assumption that DTAs are never turned off. CEA believes stakeholders will come to an agreement on the issue of DTA energy use within the NTIA coupon and Energy Star programs without attempting to project unknowable energy savings.

DTA usage patterns

CEA strongly disagrees with EPA's assumptions concerning DTA usage. Based on CEA's TV Usage Study (May 2005), CEA's TV Usage Study Update (August 2006), and CEA's CE Energy Use Study (ongoing), CEA finds that:

- The typical over-the-air (OTA) television household has 2.6 television sets;
- Seventeen percent of all U.S. households receive OTA TV on at least one TV in the home; and
- When looking only at households that receive OTA TV programming, the average number of hours per day the household is watching OTA programming is 1.4 hours. OTA households watch *much* less TV per day when compared to households that receive television programming from cable or satellite providers (2.7 hours).

Thus, a more accurate estimate of DTA usage is 1.4 hours per day.

CEA appreciates the opportunity to provide comments on the framework document and looks forward to further participation in the development of an Energy Star program for DTAs.

Sincerely,

Douglas Johnson
Senior Director, Technology Policy

Brian Markwalter
Vice President, Technology & Standards

Joseph Bates
Director, Market Research