



January 15, 2007

Katharine Kaplan Osdoba
ENERGY STAR Marketing Manager
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 digital-to-analog converter box (DTA) criteria. These comments were developed by the CEE Electronics Committee (Committee) in response to the final draft of the ENERGY STAR Program Requirements for DTAs issued on December 18, 2006. CEE maintains our support of the development of ENERGY STAR criteria for DTAs and we look forward to continuing to work with EPA as the 2009 transition to digital broadcasting nears. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

Electronic Program Guides (EPG)

CEE supports EPA's efforts to address EPGs in the ENERGY STAR DTA specification, though we do not currently have the technological expertise to comment on the proposed time limit on updates to one hour per every eight hours. The proposed approach did raise some questions for CEE, however. While we recognize EPA's preference not to define and develop a power allowance for an additional mode during which updates occur (e.g., Active Standby), we are concerned about the absence of an upper level for power usage at these times. It would be helpful to have more information on EPA's rationale for this preference. EPA might consider addressing EPG activity as a type of 'On Mode,' covered under the current 8 W power consumption level. This would avoid the creation of an additional mode while still addressing EPG power usage.

In addition to questioning the absence of an upper level for EPG power use in the DTA specification, we are also concerned about the precedent that this approach might set for future ENERGY STAR electronics specifications, particularly the impending criteria for set-top boxes (STBs), which might exhibit functionalities similar to EPGs. We understand that there is some time pressure for the development of the ENERGY STAR DTA criteria due to the expected short time window for these products, at least in the U.S. Nonetheless, we urge EPA to consider its approach to EPGs and its implications for future ENERGY STAR specifications carefully.

Finally, CEE asks that EPA clarify explicitly what will occur should a DTA *not* meet the time limit specified in the criteria, i.e., the product would not qualify for the ENERGY STAR specification.

User Interface Recommendation

CEE appreciates the provision of more detail on the specification's recommendation that DTAs meet the Power Control User Interface Standard — IEEE 1621. Now that we have a better understanding of IEEE 1621, we fully support EPA's strong recommendation that DTA manufacturers design products in accordance with it. We hope that such design consistency will allow consumers to understand and manage the power consumption of their DTAs more easily.

Future Specification Revisions

We commend EPA's commitment to monitoring the DTA market closely as it develops. While we understand that the time window for DTAs in the U.S. will likely be short, we again urge EPA to remain open to reevaluating the ENERGY STAR DTA criteria, and in particular the efficiency levels, once the market is more developed and more data is available to ensure they are appropriate.

In addition, we would like to remind EPA that, unlike the U.S., Canada does not currently have a specific cut-off date for the transition to digital broadcasting. Since Canada has chosen to rely on market forces for this transition, it is possible that it will take longer in that country than it does in the U.S. CEE asks that EPA keep this possibility in mind when considering potential future ENERGY STAR DTA specification revisions.

Thank you again for the opportunity to comment. The Committee looks forward to the release of the final criteria shortly. If you have any questions about these comments, please direct them to Erica Schroeder, CEE Program Associate, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman
Executive Director

Individual Supporters

American Council for an Energy-Efficient Economy
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New York State Energy Research Development Authority
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