



Consumer Electronics Retailers Coalition



October 25, 2006

Ms. Kathleen Hogan
Director, Climate Protection Partnership Division
United States Environmental Protection Agency
1310 L St., N.W.
Washington, DC 20005

Subject: **Joint Stakeholder Request that the Energy Star Specification for Digital-to-Analog Converter Boxes Include a One Watt Standby-Mode and Eight Watt Active-Mode Power Limit and an Auto-Power-Down Feature**

Dear Ms. Hogan:

Pursuant to the EPA's development of an Energy Star program for digital-to-analog converter boxes, the undersigned major stakeholders present a joint request that EPA adopt the following requirements for Energy Star qualification:

1. Converter box equipment shall use no more than eight watts of power in "On" state;
2. Converter box equipment shall use no more than one watt of power in "Sleep" state; and
3. Converter box equipment shall meet the auto power down requirements as described below:

Equipment earning the Energy Star shall provide the capability to automatically switch from the On state to the Sleep state after a period of time without user input. This capability shall be enabled at the factory as the default setting for the device. The default period of inactivity before the equipment automatically switches to the Sleep state shall be four hours. Eligible equipment may allow the current program to complete before switching to the Sleep state.

The default energy related settings may not be altered during the initial user set-up process and shall persist unless the user chooses at a later date to manually: (a) disable the "automatic switching to Sleep state" capability, or (b) adjust the default time period from 4 hours to some other value.

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On and Sleep state measurements shall be made in accordance with industry standards CEA-2022 and CEA 2013-A, respectively.

With respect to the EPA's recent solicitation of feedback on its specification framework document, we state or reiterate our support for a modal approach which naturally accompanies the above requirements.

Importantly, we believe the above specifications would maintain the Energy Star program's traditional voluntary nature and focus on top-tier energy performers. We are separately requesting that the National Telecommunications and Information Administration adopt the following minimum energy use requirements for converter box eligibility:

- Converter box equipment shall use no more than two watts of electricity in Sleep state; and
- Converter box equipment shall meet the auto power down requirement as described above.

Thank you for your prompt attention to and consideration of our joint request to EPA which we believe, in conjunction with our request to NTIA, fully addresses energy use performance standards as they relate to digital-to-analog converter boxes. In coordination with EPA's Energy Star program, we appreciate taking advantage of an important opportunity for energy savings while avoiding state-level regulation of converter boxes potentially detrimental to the Energy Star program and the nation's transition to digital television.

Sincerely,

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