



**UK Market Transformation Programme  
Comments on ENERGY STAR®  
Programme Requirements for Audio/Video version 2 DRAFT 1  
Circulated 22 May 2009**

MTP recognises that the requirements and test procedures are draft and incomplete at this time, and that revisions and additions will be required before the final product specification is complete. The following is submitted as constructive comment to assist in that process (the section headings and numbering are as per the draft document).

**Program Requirements**

❖ **1. Definitions**

- Section h) 2) Product Functions – audio signal processing. Some stakeholders have commented that the audio signal processing and video signal processing requirements should be combined into a single “signal processing” function, since AV signals often include audio and video content in the same stream. MTP would not support this proposal as some devices may process only one of these signals. To combine the signals into one requirement could result in a lost opportunity to drive down the energy consumption of devices which process just one of the signals, as the combined allowance is likely to be larger than the actual requirement. For example a simple radio should have a smaller signal processing allowance than a fully featured High Definition video device. Further more, MTP would suggest that the video processing allowance is split further to distinguish between High Definition and Standard Definition video processing, with care taken that the aggregated allowances remain reasonable.
- Section h) 7) Product Functions – network connectivity. MTP would suggest that it is important to distinguish between devices which connect to the network/internet occasionally (i.e.at the user’s request for additional information upload/download) and those which are permanently connected to the internet and capable of being activated (brought out of standby) remotely, either by the user, or a service provider. These products will have different TEC requirements and should therefore be treated separately.

❖ **Appendix A**

- Section 2) Applicability. It is stated that “Partners must measure a representative sample..” and that, “tests...should be performed on every product”. MTP would request some clarification of this requirement with regard to which standards should be used as a reference to determine what constitutes a representative sample, e.g. MIL 105 or similar, or indeed a fixed number of products.



- In the test procedure text some previous MTP comments still apply as follows:

**4.4 (c) Source signals:** *The use of live signals clearly represents “real world” conditions, but this does pose several problems as follows*

- *If the product is manufactured overseas, the live signal may not exist in that territory as AV broadcast systems vary across the globe. Manufacturers in territories without such signals would be unable to perform verification tests on their products.*
- *Live signals vary enormously – for example, video signals are heavily dependent on image content, audio signals on modulation depth etc. This could lead to poor repeatability of test measurements, or worse, selective content could be used to generate optimum results - thereby undermining the value of the test specification.*

*MTP would recommend that standard content is developed for these tests – this could be taken from international standards.*

**7. Test Procedures for Removable Media Players:** *Both sections (playback and record) measure the power to load the media as part of the 5 minute test. This implies that the user may be loading media every 5 minutes whereas users of DVD or BD players are more likely to load media once every hour or 2 hours. MTP would suggest that the test procedure is modified to remove the media loading power from the test if the loading power overhead is generally small...*