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Ms. Katharine Kaplan
ENERGY STAR Product Development
U.S. Environmental Protection Agency
1310 L Street, NW
Washington, DC 20460

Subject: ENERGY STAR Game Console Specification, Draft Final

Dear Ms. Kaplan:

Thank you for the opportunity to comment on the ENERGY STAR Game Console Specification, Draft Final proposal, released November 6, 2009. The Consumer Electronics Association is the preeminent trade association promoting growth in the \$172 billion U.S. consumer electronics industry. More than 2,000 companies enjoy the benefits of CEA membership, including legislative advocacy, market research, technical training and education, standards development, industry promotion and the fostering of business and strategic relationships. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute game consoles with standard and advanced features to perform a variety of multimedia functions.

As a long-time partner in energy efficiency, the consumer electronics industry is committed to the further success of the ENERGY STAR program. In particular, the game console specifications cover gaming systems with a wide range of features and is therefore well suited for comment and input from CEA. We offer the following comments to guide the ENERGY STAR Game Console Specification as its development is finalized.

As an initial matter, we would like to draw attention to the continued success of game console manufacturers in managing the energy consumption of their products. Energy efficiency improvements have been made even as consumers demand more functions and features from these evolving products. Yet, these relatively recent successes cannot drive future efforts to further reduce energy consumption. Obviously, aggressive and achievable ENERGY STAR specifications for game consoles are desirable, but manufacturers cannot indefinitely sustain the level of energy consumption improvement seen over the past few years.

Game Console Draft Specifications Interlock with Set Top Box Specifications

CEA opposes the unnecessary coupling of these game console draft specifications with the existing set top box specifications. The draft game console power requirements and testing procedures are both currently interlocked with the set top box (STB) specifications. Creating an interlocking web of specifications and test procedures for non-related products that are on different development cycles, and having disparate stakeholders, will unnecessarily cause confusion as these two product categories move forward with future revisions.

Today, no game consoles are sold with STB functionality - the capability of decoding and decrypting broadcast, cable or satellite signals and delivering content for immediate consumption. Moreover, CEA includes in its membership the vast majority of STB manufacturers and is not aware of any imminent plans to manufacture game consoles with STB functionality. Regardless, the ENERGY STAR program and consumers are best served by a specification that focuses on the primary functions of game consoles and not secondary functions that are unlikely to be added in the future.

The practice of having specifications from different product categories cross-reference each other creates many difficulties. For example, stakeholders in each product category will be forced to participate in the specification process for both product categories. Additionally, timing issues are likely to arise, as the effective dates of the cross-referenced specifications can force changes in another product category's requirements and effective dates.

The interlocking nature of the proposed game console specification with the STB specification can easily be corrected with a few minor changes to the Draft Final specification. Specifically, CEA suggests:

- line 27: delete “or “Set Top Box Functions,””
- line 64-66: delete
- Table 5; delete the two rows identified as “Set Top Box Functions”
- Table 5: delete “or STB Functions” in the latter two rows identified as “Auto Power Down”
- Appendix B: delete

These suggested changes do not alter the game console specifications in any significant way. Rather, the changes will ensure that the game console and STB specifications can continue to mature and be revised as warranted by their independent product developments and energy efficiency improvements.

System Idle Power Requirements

System Idle power requirements have been unexpectedly included in the latest revision of the proposed specification. These limits were not previously discussed or included in any of the draft requirements for game consoles and they represent a substantial new modification to the proposed requirements. CEA does not support the System Idle power limits and requests that they be removed for the Final specification.

A System Idle power limit is unnecessary because the draft specifications already include Auto Power Down (APD) during a system idle state. APD ensures that the system idle

mode will not be a significant power consumptive mode of operation. Power limits should not be established for operating modes that consume very little energy. A System Idle power limit will increase a game console's complexity while providing very little energy savings.

Additionally, during the system idle mode, a game console will often utilize its graphic and audio functions to display game preview screens, animations, thumbnails, etc. on the Menu screen. A System Idle power limit will restrict such functionality and adversely affect the user interface and entertainment value of the game.

Media Functions Power Requirements

The primary function of a game console is playing video games. Playing media is a secondary function that is desirable to many consumers as it prevents the purchase of a separate, dedicated media player. Of course, a separate media player would have its own energy use characteristics. Combining media play functions into game consoles is therefore attractive to manufacturers and consumers alike. The stringent Media Functions power limit will substantially increase the costs of manufacturing game consoles, or preclude opportunities to provide additional features for the same cost. This outcome will reduce the value of ENERGY STAR qualified game consoles to consumers. Accordingly, CEA does not support the Media Play power requirements and requests that they be removed from the Final specification.

Other Concerns

In addition to the concerns raised above, CEA notes that game consoles have significantly different functions and capabilities and should not be considered a standardized product when comparing and discussing energy use. Game consoles, unlike other consumer electronic products, are much more diverse products and the characteristic features of each generation are not uniform. There is a substantial distinction both in performance and functionality among manufacturers' products. Some systems are high definition, multi-function, entertainment centers while others are used almost exclusively as traditional game consoles. The power consumption of a game console is directly related to its function and performance characteristics.

As noted above, an ENERGY STAR specification that is both aggressive and achievable is desired by industry. Yet, the proposed game console specification is simply not achievable. Accordingly, with the exception of Nintendo of America, Inc., interested CEA stakeholders urge the EPA to delay publication of the Final game console specification. Doing so will provide game console manufacturers, as well as the consumer electronics industry at large, an opportunity to work cooperatively with the EPA in developing a specification that will have a better chance of being adopted in the marketplace.

The ENERGY STAR program for consumer electronics has been, and remains, a huge success. CEA member companies have a strong interest in the continued success of the ENERGY STAR program. We urge the EPA to meet with manufacturers and their representatives to adequately address the many difficulties contained in the currently proposed Draft Final specification. CEA stands ready to facilitate this continued discussion

to ensure a successful launch of the ENERGY STAR logo program into this new and important product category. As always, please do not hesitate to contact us if you have any questions or requests.

Sincerely,

A handwritten signature in blue ink that reads "Bill Belt". The signature is written in a cursive, slightly stylized font.

Bill Belt
Senior Director, Technology & Standards