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April 12, 2010

Ms. Kathleen Vokes
US Environmental Protection Agency
ENERGY STAR for Set-top Boxes
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR® Program Requirements for Set-top Boxes

Dear Ms. Vokes:

On behalf of the National Cable & Telecommunications Association (“NCTA”),¹ I am responding to the request by the Environmental Protection Agency (“EPA”) for comments from industry stakeholders on the ENERGY STAR® Program Requirements for Set-top Boxes.

NCTA and its members have supported and continue to support the voluntary ENERGY STAR federal program designed to promote the manufacture and use of more energy-efficient set-top boxes. We welcome this opportunity to submit comments and recommendations on the ENERGY STAR® Tier 2 proposal to supplement the Draft 1 Version 3.0 ENERGY STAR® Set-top Box specification.

Additional Functionality

Table 2 of the proposed Draft 1 Version 3.0 specification contains the category *Additional Tuners – Terrestrial/IP*. However, the Tier 2 proposal to supplement Draft 1 Version 3.0 replaces this category with *Additional Tuners OTA* - under both Tier 1 and Tier 2 - but provides no definition for this new category. We seek clarification from EPA on the rationale for this change and whether a manufacturer is now prevented from utilizing this allowance for an additional tuner used in an IP set-top box.

¹ NCTA is the principal trade association for the U.S. cable television industry, representing cable operators serving more than 90 percent of the nation's cable television households, more than 200 cable program networks, and suppliers of equipment (including set-top boxes) and services to the cable industry.

Digital Transport Adaptor

As proposed, the base annual energy allowance allocated to a Digital Transport Adaptor (“DTA”) under Tier 2 would be 24 kWhr/year, a greater than 30% decrease from the 35 kWhr/year proposed for such devices under Tier 1. Given that DTAs are, by their very nature, designed and built to operate as energy efficiently as possible, we believe that the proposed Tier 2 allowance is too low. We respectfully request that the EPA raise the proposed Tier 2 allowance from 24 kWhr/year to 30 kWhr/year. This would maintain a similar allowance reduction percentage for Tier 2 as currently proposed for the Cable set-top.

DOCSIS

As proposed, the annual additional energy allowance allocated to DOCSIS under Tier 2 would be 15 kWhr/year. However, we anticipate that DOCSIS 3.0 will be in use in set-tops by the Tier 2 effective date of June 1, 2013. To account for the additional energy necessary for to support DOCSIS 3.0, we believe that the proposed Tier 2 allowance to be too low. We respectfully request that the EPA retain the Tier 1 allowance of 20 kWhr/year for Tier 2.

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NCTA looks forward to working with the EPA and other stakeholders in developing the ENERGY STAR® Program Requirements for Set-top Boxes. We believe the comments and suggestions we have offered will help balance the goals and objectives for the program with an ever-increasing desire by cable customers for additional features and functions in set-top boxes, and establish reasonable criteria that will allow cable service providers and manufacturers to make improvements in product energy efficiency. Should you have any questions or seek additional information, please do not hesitate to contact me.

Sincerely,



Andy Scott
Vice President of Engineering

cc: Stephen Pantano, ICF International