



December 18, 2015

Ms. Katharine Kaplan
Manager, ENERGY STAR Product Development
& Program Administration
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

**Re: ENERGY STAR Version 5.0 Set-Top Box Specification
and Test Method – Draft 1**

Dear Ms. Kaplan:

ARRIS Group, Inc. (“ARRIS”) welcomes the opportunity to comment on Draft 1 of the ENERGY STAR Version 5.0 Set-Top Box (“STB”) Specification¹ and Test Method,² and provides below suggestions related to the Specification.

1) Auto Power Down and Deep Sleep State (Lines 227-31; 245-46)

EPA’s proposed requirements in Sections 3.2.3 (Auto Power Down) and 3.2.4 (Deep Sleep State) of the Draft 1 Specification do not align with how the marketplace operates. EPA proposes to require that “products shipped *with software from the manufacturer* shall ship with [Auto Power Down/Deep Sleep] enabled by default.”³ However, like many features on a STB, Auto Power Down and Deep Sleep are implemented through Application Programming Interfaces (APIs) that are controlled by application software. The application software, which displays the user interface and controls scheduled recordings, determines when the STB is ready to enter into a low-power state. As a STB manufacturer, ARRIS does not provide this software. As a result, ARRIS has no ability to ensure that default energy-related settings are preserved. Consequently, EPA should clarify that the requirements in Section 3.2.3 and 3.2.4 do not apply to the STB manufacturer.

¹ See Letter from Katharine Kaplan, Manager, ENERGY STAR Product Development and Program Administration (November 16, 2015); ENERGY STAR Product Specification for Set-top Boxes, Eligibility Criteria, Draft 1 Version 5.0 (“Draft 1 Specification”).

² See Letter from Katharine Kaplan, Manager, ENERGY STAR Product Development and Program Administration (December 2, 2015); ENERGY STAR Program Requirements, Product Specification for Set-top Boxes, Draft 1 Test Method, Rev. Dec-2015 (“Draft 1 Test Method”).

³ See Draft 1 Specification, Lines 227-28, 245-46 (emphasis added).

2) Base Type and Additional Functionality TEC Allowance (Section 3.3 & Tables 2 & 3)

EPA states its intention to “set a single base allowance for all STBs that connect to an MVPD network (Cable DTA, Cable, Satellite, and MVPD IP) and address any differences through functional adder allowances” given that the “efficiency across all base types has improved”⁴ EPA states that this approach “allows a varied selection of products across the different base types and functionalities to qualify, including models with DVR, HNI (wired and wireless), and [Multi-room] functionality.”⁵ While ARRIS appreciates EPA’s attempt to provide flexibility, both the base TEC allowance and the additional functionality allowances are, in general, insufficient for many STBs to qualify, even as STBs continue to become more energy efficient.

In particular, ARRIS is concerned with EPA’s proposals to (i) use the same base TEC allowance (40 kWh/year) for all STBs, regardless of whether the box is a DTA, Cable, Satellite, or IP Box, and (ii) eliminate both Multi-Stream allowances. As to the first proposal, it fails to recognize how the differing technologies work from energy consumption standpoint, particularly when combined with the cuts proposed to the additional functionality allowances. As to the second proposal, when combined with the lower base TEC, it would make the make qualification unattainable for many STBs.

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ARRIS appreciates this opportunity to comment and looks forward to further discussions with EPA about the Draft 1 Specification and Test Method. Please contact me if you have any questions regarding this matter.

Sincerely,

/s/ Jason E. Friedrich
Jason E. Friedrich
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& Regulatory Affairs
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⁴ See *id.*, Note at Lines 325-338.

⁵ See *id.*