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Sent: Thursday, December 17, 2015 5:16 PM
To: stbs@energystar.gov
Cc: Daniel Shiflet
Subject: ES V5 Draft 1 comments

ENERGY STAR STB draft:

Thank you for your continued efforts on this product category and for this opportunity to provide feedback. Although most of the effort at this point relates to manufacturing partner requests, Keystone is concerned about our inability to have verification tests performed on the products in a meaningful configuration. STB performance is controlled by the software installed by the cable provider and to a large degree is not the responsibility or purview of the STB manufacturer.

We also have concerns that there are no third party labs capable of performing the tests, as products typically can't be tested without the very expensive "head-end signal generator". EPA/DOE needs to ensure third party testing is possible and available, especially where verification testing is considered. EPA has continued to take the stand that Manufacturers, and not Providers take on the responsibility of Energy Star compliance when the consumer gets the product from a Provider, and this consumer product is much different than the Manufactured product procured for verification testing. These procured boxes are often un-testable. We do appreciate the specification calling out worst case testing, but understanding how a lab or CB can provide that assurance is in question.

Specification

Page 6: par 3.2.2i Maintenance Activities

CB's will have difficulty verifying this 'average of two hours in any 24-hour period'. Even manufacturers have not been able to comply with this as it is a Provider function and the Provider would be required to comply. Not sure how you can respond to this, aside from getting the Providers involved with Certification Bodies as mentioned above.

We appreciate the additional clarity with Multi-room (MR) definition and requirements, especially in Test Method.

Page 10, Table 3

It seems that the second CableCARD may have allowance reduced to 5, or even 2 CableCARDS allowing total 15 kWh/yr. Perhaps Multi-stream small allowance (3) can be available to non MR, HNI or DVR products (if that exists).

Test Method Draft 1 Rev Dec-2015

Page 1, 4.1A) A newer CEA-2043 version; August-2013 is available.

Thank you,

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