

June 30, 2014

Ms. Verena Radulovic
Product Manager, ENERGY STAR® for Consumer Electronics
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, DC 20460

Subject: RVU Alliance Comments on ENERGY STAR® Televisions Version 7.0 Draft 1 Specification

Dear Ms. Radulovic:

The RVU Alliance (www.rvualliance.org) is an Oregon-based non-profit corporation formed to develop a specification for the RVU technology. The RVU Alliance mission is to ensure interoperability and a consistent user interface among devices for whole home premium television entertainment. The Remote User Interface (RUI) technology allows a set-top box in the home to provide a consistent User Interface (UI) and feature set to all compliant RVU TVs. By integrating the RVU software, a connected TV eliminates the need for a set-top box but still provides the full PayTV operator feature set directly on the TV, including full DVR capability.

The Alliance consists of more than 30 member companies, including PayTV operators in the US (DIRECTV) and Latin American (Sky Brasil, Sky Mexico and DIRECTV PanAmericana), major TV manufacturers (Samsung, Sony, LG, Panasonic, Sharp and Toshiba) and many more technology suppliers (e.g. Broadcom, Humax, MStar, Pace, ST Microelectronics, Universal Electronics, Technicolor, Awox, JetHead Development).

Sharing a common goal of whole home premium television entertainment for consumers' devices, RVU Alliance member companies have developed a complete specification and certification capability to facilitate the development and deployment of interoperable RVU certified devices.

RVU is the basis of DIRECTV's highly successful "Genie" Whole Home DVR which launched in 2012 along with the first client devices. To date millions of clients have shipped, including RVU support in all Samsung's "Smart" TV products from 2012 onwards, select Sony 2013 and 2014 TVs and recently joined by select TVs from Toshiba's 2014 product line. More TV models will launch imminently.

We are pleased that the ENERGY STAR® Televisions Version 7.0 Draft 1 Specification proposes the addition of a new "Thin Client Capability" definition, and agree with the EPA's assessment that open industry standard technologies such as RVU create "the potential for eliminating redundant electronics in the home to save both material resources and energy". We would reinforce this position that RVU has already deployed and is already removing the need to deploying multiple set-top boxes in the home.

We also support the EPA's intention to "offer partners the ability to highlight thin client capability on the ENERGY STAR certified products list". The benefits of the EPA's proposal are that qualified TV models listed in this way 1) would be seen by consumers as allowing for a receiver-less installation and 2) could furthermore become eligible for additional consideration in utilities' energy efficient TV promotions.

The introduction of any new connection standard is normally characterized by a “chicken and egg” problem where the makers of output devices (in this case, home media servers) and the makers of input devices (thin client capable televisions) must both decide to create compatible products. The RVU Alliance has already overcome this problem with the deployment of the solutions to market already. However we share the EPA’s aim to further adopt standard technologies to reduce the number of superfluous electronics in the home and share in encouraging additional RVU certified television models to be produced, which will in turn incentivize more Pay-TV service providers and home media server manufacturers to develop and deploy more RVU certified servers. As more compatible products are fielded, more opportunities for receiver-less connections are created and the energy saving benefit accrues.

Please note that each thin client capable technology that EPA chooses to recognize must allow for the full home media server experience to be conveyed, as if the television was connected directly to the server via an HDMI cable. The technology must also be an open standard available to be implemented by any manufacturer (e.g. it cannot be proprietary to a particular Pay-TV provider or TV manufacturer). Of the industry standards identified by the EPA in Draft 1, RVU and DLNA CVP2 meet these criteria.

The RVU Alliance appreciates this opportunity to share these comments.

Respectfully submitted,



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