

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Northeast Energy Efficiency Partnerships

September 10, 2013

Ms. Katharine Kaplan
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: ENERGY STAR Specification for Set-Top Boxes, Version 4.1 - Response to Environmental Protection Agency Memo

Dear Ms. Kaplan:

On August 29, 2013, the U.S. Environmental Protection Agency (EPA) released to stakeholders a memorandum responding to comments made on EPA's second draft of its ENERGY STAR version 4.1 specification for set-top boxes (memo). This letter is written in response to the memo and is submitted on behalf of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), and the Northeast Energy Efficiency Partnerships (NEEP). Again, we thank EPA for its diligence in developing this specification and its responsiveness to stakeholder feedback.

Deep Sleep – We fully support a deep sleep incentive requiring a default scheduled deep sleep from 1am until 5am.

In comments submitted in response to EPA's second draft of version 4.1, ASAP and other allied organizations joined NRDC in requesting that qualification for the deep sleep incentive require set-top boxes to have a deep sleep button on the remote control and a scheduler deployed for a daily minimum of 4 hours of deep sleep. This was in response to EPA's proposal of one or the other of these features being necessary to qualify for the incentive. Our concern regarding EPA's proposal was that the mere presence of a deep sleep button is in no way indicative of likely use. We therefore fully support EPA's new proposal requiring a default scheduled deep sleep between the hours of 1am and 5am, with the additional protection of prohibiting manufacturers or service providers from prompting users to disable the scheduled deep sleep. We also continue to support the inclusion of a deep sleep button on the remote control as a requirement for the deep sleep incentive.

We also support EPA's proposal of requiring that set-top boxes be able to wake from deep sleep mode for prescheduled recordings and updates, after which the unit would return to deep sleep mode. We do, however, share concerns reflected in comments by NRDC (submitted to EPA on September 6, 2013) that allowing up to five minutes and 30 seconds for a unit to transition to on mode after the end of a scheduled deep sleep could prove to be unacceptable to users, especially if the user is scheduling deep sleep during the day and wants to begin accessing content immediately following the end of the scheduled deep sleep. We would recommend that this five minute transition time be incorporated into the scheduled deep sleep, so that it begins transitioning five minutes prior to the scheduled end of deep sleep. This would allow the unit 30 seconds from the scheduled end of deep sleep to fully transition to

on mode, reducing the likelihood of user frustration resulting in the disabling of the deep sleep scheduler.

Base Allowances – We support EPA’s decision not to increase allowances for DVRs and understand its reasoning for increasing allowances for thin clients.

We agree with EPA’s decision not to create a new adder for DVRs that are incapable of providing live TV to second and third TVs in the house. As mentioned in the NRDC comments, ENERGY STAR is a voluntary, aspirational program; a true multi-room solution, where the DVR provides both live and recorded TV to the thin clients servicing second and third TV’s, is the most energy efficient whole home solution and a solution that ENERGY STAR should be encouraging. Additionally, in our previous comments we outlined the important savings opportunity represented by thin clients. We believe that the final version 4.1 levels for thin clients are reasonable.

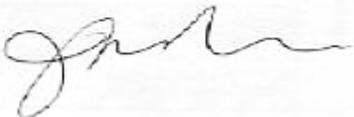
Finally, we urge EPA to finalize the specification as quickly as possible, so that industry stakeholders can begin preparations for meeting the new levels.

Many thanks to EPA for coordinating such a robust specification development process and for considering these comments. Please contact us if you have any questions or require any further information. We look forward to seeing the final version.

Respectfully submitted,



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