

Appliance Standards Awareness Project
Alliance to Save Energy
American Council for an Energy-Efficient Economy
Northeast Energy Efficiency Partnerships
Northwest Energy Efficiency Alliance
Northwest Power and Conservation Council

July 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 Draft 2

Dear Ms. Kaplan:

On May 30, 2013, the U.S. Environmental Protection Agency (EPA) distributed the second draft of its ENERGY STAR version 4.1 specification for set-top boxes. This letter is written in response to the draft specification and is submitted on behalf of the Appliance Standards Awareness Project (ASAP), the Alliance to Save Energy, the American Council for an Energy-Efficient Economy (ACEEE), the Northeast Energy Efficiency Partnerships (NEEP), the Northwest Energy Efficiency Alliance (NEEA), and the Northwest Power and Conservation Council. In addition to the comments submitted below, the undersigned organizations would like to inform EPA of their collective formal support for comments submitted by the Natural Resources Defense Council (NRDC) on June 26, 2013.

Scope – We support EPA’s decision to include displayless video gateways in the ENERGY STAR specification and to include allowances for set-top box network equipment functionality.

The undersigned organizations fully support EPA’s decision to include set-top boxes that directly connect to a TV via a video output and those that provide content via an Ethernet cable or wireless network. This approach will help ensure the continued relevance of ENERGY STAR for this particular product category as industry begins to provide content through such alternate means. Additionally, we support the inclusion and proposed annual energy allowances for network functionality incorporated into set-top boxes.

Deep Sleep – To qualify for the deep sleep incentive, EPA should 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.

In its second draft of the ENERGY STAR v4.1 specification for set-top boxes, EPA offers a deep sleep annual energy allowance of 20% if the set-top box has a remote control with a deep sleep button or if the set-top box has a user scheduler deployed automatically to place the unit into deep sleep mode for certain hours of the day. With respect to the deep sleep button, we believe that the simple existence of

a deep sleep button provides no guarantee that users will ever take advantage of this functionality. Instead, we support the following NRDC recommendations designed to ensure actual energy savings as the result of the ENERGY STAR deep sleep requirements:

1. EPA should require both the deep sleep button on the remote control as currently defined and the inclusion of the deep sleep scheduler in order to be eligible for the deep sleep incentive.
2. The deep sleep scheduler should be set and deployed with a default deep sleep setting of 4 hours (1am-5am), or longer if the service provider so chooses.
3. EPA should not require deep sleep to have a recovery time of 30 seconds during the deep sleep scheduled period. The 30 second recovery time should only apply to times outside of the prescheduled deep sleep period.
4. EPA should revisit the savings that would be provided from a 4 hour deep sleep implementation according to its specification and then adjust its incentive level from .17 accordingly.
5. The user may modify the deep sleep settings at a later time. The manufacturer may not however disable this feature after deployment or prompt the user to do so at a later date.

Thin Clients – EPA should set a sufficiently stringent specification for thin clients based on currently available technology.

We join industry and others in recognizing the great energy savings opportunity that thin clients represent for homes with multiple televisions. However, efficiency levels for thin clients should be based on the most efficient technology available to garner the greatest possible energy savings and to encourage the widespread adoption of such technologies. To that end, we urge EPA to consider the C-41 family of thin clients offered by DirecTV that use 40-44 kWh/year for thin clients with HNI, and 59 kWh/year for thin clients with HNI, Wi-Fi and MIMO. We believe EPA should set its thin client base levels and adders at levels similar to those achieved by these devices.

Thank you for considering these comments.

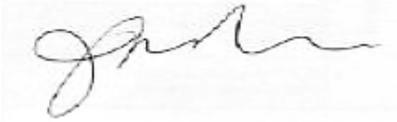
Sincerely,



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