



NATURAL RESOURCES DEFENSE COUNCIL

**NRDC Comments on ENERGY STAR's March 7, 2014 Proposal on Qualification and Reporting for Set Top Boxes Under Version 4.1**

Submitted By:

Noah Horowitz

NRDC Senior Scientist

[nhorowitz@nrdc.org](mailto:nhorowitz@nrdc.org)

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On behalf of the Natural Resource Defense Council (NRDC) and its 1.3 million members and electronic activists we are writing to express our strong support for the approach EPA detailed in its March 7, 2014 letter regarding testing and certification requirements for ENERGY STAR set-top boxes (STBs). We believe ENERGY STAR's approach will prevent STBs that consume higher levels of energy on certain service provider networks from being shown as being ENERGY STAR qualified in cases when it should not. Below we provide more detailed comments on ENERGY STAR's proposal.

*1. The proposed approach will help prevent consumers from receiving set top boxes improperly labelled as ENERGY STAR and not receiving the energy savings they were expecting*

Prior to ENERGY STAR's new proposal a set top box manufacturer was able to test their set top box on the service provider of their choosing as part of the ENERGY STAR qualification process, even if the energy use of that set top box would be dramatically higher when tested on other service providers' networks. This could result in some consumers receiving a STB that was labelled as ENERGY STAR even though it did not meet the required energy levels on one or more service provider networks. **This scenario where models are listed as ENERGY STAR qualified even though they don't perform that way in many homes would harm the public credibility of the ENERGY STAR brand and needs to be avoided.** The approach outlined by EPA on March 7<sup>th</sup> will require manufacturers to report and base their qualification on testing done on the most consumptive service provider network and will prevent undeserving models from being qualified.

*2. The service providers have already moved to testing and reporting the energy use of their new set top boxes on their own networks.*

The model and service provider specific energy use data is already being published on websites such as <http://energy.cablelabs.com/> in fulfillment of industry's commitments under the Voluntary Agreement it signed. As such the industry will not be facing any additional testing burden under EPA's latest proposal.

*3. The proposed family approach provides flexibility for manufacturers and service providers to assign individual model numbers to those models that perform better than the test results on the most consumptive network.*

ENERGY STAR's new approach allows manufacturers to use a single entry for the energy use of a model for all service providers where the STB meets the ENERGY STAR requirements. With this family approach, the manufacturer is required to list the data from the most consumptive qualifying service provider network.

Should a service provider possess test data that shows that the model being qualified uses significantly less energy on their network than the most consumptive level for that model, then they can choose to have this model listed with a different model number along with its energy use. This provides them with a means to report their lower energy use and the ability to demonstrate their leadership to those consumers who are interested in lowering the energy use of their STBs.

*4. The ENERGY STAR website should be updated to show which service providers the STB model meets the ENERGY STAR requirements.*

With the family approach, a particular model may meet ENERGY STAR's requirements when operated on some but not all of the service providers' networks. As such, to aid consumers we recommend ENERGY STAR add a column to its list of qualified products for the service provider.