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Ms. Katharine Kaplan  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
1310 L Street, NW  
Washington, DC 20005

Subject: ENERGY STAR Set-top Box Specification, *Discussion Guide for Proposed Edits to Versions 3.0 and 4.0 ENERGY STAR Program Requirements for Cable, Satellite, and Telecom Service Providers*

Dear Ms. Kaplan,

Thank you for the opportunity to comment on the *Discussion Guide for Proposed Edits to Versions 3.0 and 4.0 ENERGY STAR Program Requirements for Cable, Satellite, and Telecom Service Providers*, reviewed during the July 7 stakeholder conference call. The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the \$175 billion U.S. consumer electronics industry. More than 2,000 companies enjoy the benefits of CEA membership, including legislative advocacy, market research, technical training and education, industry promotion, standards development and the fostering of business and strategic relationships. CEA also sponsors and manages the International CES – The Global Stage for Innovation. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute set-top boxes (STB) with a variety of basic and advanced features.

As a long-time partner in energy efficiency, the consumer electronics industry is committed to the further success of the ENERGY STAR program. In particular, the STB specifications cover devices with a wide range of features and is therefore well suited for comment and input from CEA. We offer the following comments to guide the ENERGY STAR set-top box specification revision as its development proceeds.

As noted in previous CEA comments, set-top boxes continue to evolve quickly in response to changes in consumer demands and behaviors, and evolving market trends in video and other entertainment distribution. New architectures are being deployed, such as the client/server architecture which will benefit energy efficiency. New features and functions are being deployed and considered, such as MoCA, Wi-Fi, and Zigbee capabilities. This dynamic transformation from simple set-top boxes to more complex and robust devices, integrating more functionality, continues at a rapid pace.

The current draft of the specifications anticipates a Version 3.0 effective date of June 1, 2011 and a Version 4.0 effective date of June 1, 2013. We appreciate the EPA's effort to

align the effective date month with existing production dates for STBs. A June effective date will properly align the specifications with STB production schedules. However, we remain deeply concerned about the effective date year for Version 3.0. The rapid evolution of STB design and functionalities, combined with the long lead times required to ensure adequate availability of chip sets and other power saving control features, makes the Version 3.0 effective date of June 1, 2011 too aggressive to ensure it can be achieved by a variety of products across all feature sets. As a general rule, industry prefers an 18 month lead time, combined with a summer implementation date, for the effective dates of new or revised ENERGY STAR specifications. **Accordingly, we strongly urge that the EPA consider an effective date of June 1, 2012 for qualification under Version 3.0.** We believe this date is aggressive, but more likely to be met by manufacturers.

Cable, satellite, and telecom service providers require certainty in the availability of ENERGY STAR-eligible set-top boxes in order to confidently participate in the program. The aggressive energy limits currently contemplated, along with the short time frame for implementation, do not provide enough confidence in availability of eligible products.

The EPA's effort to enhance its certification and verification requirements also dramatically increase the uncertainty in availability of eligible set-top boxes. The new certification and verification requirements have not been finalized, yet these requirements will have a profound influence on all product categories. Clearly there are dependencies between product requirements and certification and verification requirements. A later, more reasonable, effective date will minimize the uncertainty created by the yet unfinished certification and verification requirements.

Finally, the energy efficiency allowances for both base functionality and additional functionality were recently modified again, as a result of stakeholder comments. The new allowances were released on July 7 in an effort to allow for more thoughtful discussion. Manufacturers continue to study these allowances and more analysis is required.

An ENERGY STAR specification that is both aggressive and achievable is desired by industry. Yet, the proposed set-top box specification suffers from too many unknown variables that cloud the opportunity for success. CEA urges the EPA to delay the effective date of the set-top box specification. Doing so will provide manufacturers and service providers an opportunity to work cooperatively with the EPA in developing a specification that will have a better chance of being widely adopted in the marketplace.

CEA invites the EPA and other stakeholders to a presentation from manufacturers prior to release of the Draft 2 of the specification, currently scheduled for the week of August 23. Specifically, **CEA is hosting a face-to-face meeting August 19 at 10:00 AM ET.** We believe that an industry led meeting will give all stakeholders an opportunity to further explore the energy allowances, investigate the effective date of the specifications, and update participants on the continued development of the client/server architecture and its benefits to energy efficiency. Please confirm your availability so that final details of the meeting can be planned.

The ENERGY STAR program for consumer electronics has been, and remains, a huge success. CEA member companies have a strong interest in the continued success of the ENERGY STAR program. We urge the EPA to meet with manufacturers and their representatives to adequately address the many issues highlighted in the Discussion Draft. CEA stands ready to facilitate this continued discussion to ensure a successful implementation of the ENERGY STAR program for this important product category. As always, please do not hesitate to contact us if you have any questions or requests.

Sincerely,

A handwritten signature in blue ink that reads "Bill Belt". The signature is written in a cursive, slightly slanted style.

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Bill Belt  
Senior Director, Technology & Standards

Cc: Kathleen Vokes, EPA  
Stephen Pantano, ICF International  
Tom Bolioli, Terra Novum