

December 4, 2009

Katharine Kaplan
ENERGY STAR® Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the Draft Final ENERGY STAR Requirements for Game Consoles distributed to stakeholders on November 6. These comments were developed by the CEE Consumer Electronics Committee (Committee). Thank you for the opportunity to provide input. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE shares EPA's interest in increasing the energy savings opportunities for game consoles and appreciates the effort it has invested in tailoring ENERGY STAR labeling requirements to the unique nature of these products and the market. We would like to thank EPA for making its staff available to help the Committee better understand this product area and the proposed requirements. As indicated in our comments dated October 16, 2008, game consoles are a product of interest to CEE's members; however, the Committee has limited performance and market information about them. Given this relative lack of knowledge, we do not have a strong basis for assessing the general approach for game consoles, nor the specific proposed requirements. We do, however, have several comments and questions for your consideration.

ENERGY STAR and Game Consoles

Game consoles appear to be a product category with several important differences from other electronics product categories covered by ENERGY STAR. For example, it is the Committee's understanding that there are essentially only three major manufacturers and only three current versions of products available for sale at any point in time. We also understand that each manufacturer brings a new version of its product to market every 3-5 years.

Given these unique circumstances, a labeling strategy for game consoles may present challenges for energy efficiency programs as far as offering financial incentives is concerned. Funds used by energy efficiency programs are generally public purpose in nature. As a result, there is a high bar for their use, and several Committee members have indicated that they will be hard pressed to promote ENERGY STAR labeled game consoles to their customers using these funds. Because funds are public purpose there is typically a requirement that they are not given exclusively to a single provider. With only three providers manufacturing products that are covered by the specification, there is a strong possibility that only one provider's product will qualify for ENERGY STAR, especially in the near term. On the other hand, if all three products on the market qualify for ENERGY STAR, there is no need to encourage purchase of a particular performance level as there are no options.

CEE notes that this specification represents a somewhat unique use of the ENERGY STAR label, which typically differentiates the top 25 percent of efficient models in the market. It is difficult for CEE to determine if a departure from the norm of this type is appropriate. To help us assess the affect on the brand and the implications for efficiency program administrators, we would like to understand the conditions under which this type of use is appropriate. In addition, we believe it is important to understand at what point (e.g., how many exceptions) the brand promise begins to change. In a larger context, it may be more appropriate to entertain a separate vehicle to achieve what might otherwise be seen as a minimum standard.

Specific Requirements

As indicated by EPA during the Committee's November 24 meeting, a major focus of the specification is on the secondary functionalities of the game consoles, i.e., the energy performance of the console when it is being used for media playback or as a set-top box and not being used to play games. The Committee believes the specification would benefit from clarification about how these requirements relate to other ENERGY STAR electronics product specifications:

- What is the relationship between the Media Functions requirements in Tier 3 of the game consoles requirements and the ENERGY STAR Audio/Video specification requirements?
- EPA is currently reexamining the Tier 2 requirements for set-top boxes, scheduled to be effective on January 1, 2011. As these requirements have not been finalized, it is challenging for stakeholders to assess whether Tier 2 and Tier 3 game consoles requirements that require game consoles to meet the Tier 2 set-top box specification are appropriate.
- In the references to the Tier 2 set-top box specification, it is unclear which portions of the set-top box specification are relevant. Will the service provider requirements associated

with the ENERGY STAR set-top box specification be applied to the game consoles specification?

While the Committee is pleased to see that the proposed requirements will result in energy savings per unit in the range of 30-40 percent (according to EPA's estimates), it encourages consideration of whether an additional energy savings opportunity is available when the game console is connected to a video display and no video functionality is needed. For example, when the game console is in an idle or inactive state, it may be possible for the game console's video output signal to be disabled to ensure television or other display device power is also reduced. Similarly, savings could be achieved when the game console is functioning solely for audio media playback and no video signal is necessary. The Committee asks EPA to consider including requirements that would address these situations. One possibility might be for the specification to state that video output must be disabled within a set time after the game console ceases to send video signals to the television or other display, allowing that product to go into a lower power mode until video input is again received from the user and returns the video display to active mode. It is our understanding that this type of functionality is widely used in power management software for personal computers today.

Thank you again for the opportunity to comment. If you have any questions about these comments, please direct them to Margie Lynch, CEE Program Manager, at (617) 337-9277.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

BC Hydro
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