



December 4, 2009

By Email (kaplan.katharine@epa.gov)

Ms. Katharine Kaplan
ENERGY STAR for Consumer Electronics
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Ms. Kaplan:

The Entertainment Software Association submits this letter in response to the EPA's November 6, 2009 request for comments on the Draft Final ENERGY STAR Game Console Requirements ("Game Console Specification").¹ We support voluntary efforts to bolster the energy efficiency of our industry's products and thank the EPA for this opportunity to comment.

The Game Console Specification reflects benchmarks that are difficult or impossible for console makers to presently achieve. Accordingly, ESA respectfully urges the EPA to address three key concerns before finalizing and implementing the Game Console Specification. These concerns are: (1) system idle power limits; (2) media functions power limits; and (3) the auto-save requirement for automatic power down. Our industry is committed to working closely with the EPA to address the areas of concern and arrive at a consensus standard that can be widely adopted.

System Idle Power Limits

Current generation game consoles are rarely "idle." Idle truly means inactive and, when inactive, the most energy efficient mode for the console to be in is off. Thus, a system idle power limit is unnecessary in light of the Game Console Specification's requirement for auto-power down (APD) after one hour of user inactivity, a requirement with which our industry has little issue.

¹ The Entertainment Software Association (ESA) is the U.S. association exclusively dedicated to serving the business and public affairs needs of companies that publish computer and video games for video game consoles, handheld devices, personal computers, and the Internet.

Media Functions Power Limit

Consumers use game consoles to play games first and foremost. The media hub functionality of consoles is secondary. We support the EPA's efforts to develop an ENERGY STAR standard that applies to game consoles when used for their primary function. But imposing separate and parallel power standards—one for game functions and another for media play functions—is highly problematic from an engineering design standpoint.² This concern is not addressed in similar multifunction products like PCs.³ With respect to media functionality, the current Game Console Specification appears to unfairly target game consoles.

Console makers have optimized their hardware for game play while building in dual functionality where feasible. For example, a firmware update enables an optical drive to play back movies as well as load games. Movie playback draws upon the same chipsets as game play, and those chips are designed with the higher power needs of games in mind. Yet, to meet the proposed media function power limit, console makers would be required to add in dedicated, lower power circuitry for the sole purpose of playing back DVDs. The increased costs associated with this would discourage console makers from including dual functionality at all. If future consoles do not include a DVD playback function, consumers who want that capability would be forced to buy another device. This is not an energy efficient result.

For all these reasons, maximum power limits for media play functions should not be part of the Game Console Specification.

Auto-save on Automatic Power Down

Implementing auto-save on APD is not a trivial matter for game software. When and where users can save their place in a game is often integral to the user's experience of the game. Many games use a "checkpoint" save system in which the user may only save the game after reaching certain checkpoints. There are important game play considerations for doing this. It encourages players to achieve a certain amount of progress each game session. It also raises the stakes by forcing a player to overcome a particular obstacle before earning the benefit of a game save.

Auto-save on APD would require game publishers to redesign their games for a "save anywhere" capability. Switching to a "save anywhere" structure might undermine the advantages of a checkpoint save system. Additionally, it may not be feasible for some games. Online games, such as massively multiplayer online games (MMOs) and games that feature cooperative game play (where you play a game with a few friends connected online), are not self-contained, stand-alone experiences. Saving the game on APD would

² It also ignores the practical consideration that dual console uses are not mutually exclusive.

³ This is ironic considering that many PCs consume multiple times more power than a game console.

not allow the user to return to the exact situation later because that situation is dependent upon the actions of other users who may no longer be online.

Another disadvantage of a "save anywhere" system is that it may consume considerably more memory than a checkpoint system. This is because the game must store a snapshot of what is going on at the exact moment of the save. We understand that this process may consume as much as 512 MB, a substantial amount of memory for a game console.

One solution might be "auto-save to the last checkpoint." But this is a poor solution from a consumer perspective; a consumer stands to lose substantial progress where the console goes into auto-save at a point just shy of the next save point. (This might happen, for example, where the user takes a phone call and pauses the game for longer than an hour.)

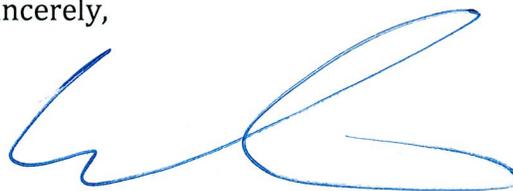
Our industry can strongly support an Auto Power Down (after some period of time) requirement, but not the auto-save requirement at this time.

Conclusion

Our industry supports energy efficiency and partnering with ENERGY STAR to that end. The goal, as we see it, is to implement an ENERGY STAR standard that will be used to improve energy efficiency in the home. We are committed to working with the EPA on the areas of concern set forth above to develop a workable standard that sets tough but achievable benchmarks. With that goal in mind, we ask the EPA to not hesitate to take further input from our industry on the above-noted concerns before finalizing this Game Console Specification.

Individual filings by the console makers may cover other aspects of the Game Console Specification, and we commend those remarks to the EPA's attention. We are grateful to the EPA for the opportunity to submit these comments, and we look forward to future opportunities to provide further input on these important issues.

Sincerely,



Kenneth L. Doroshow
Senior Vice President & General Counsel
Entertainment Software Association
575 7th Street NW, #300
Washington, DC 20004