



December 20, 2010

Ms. Katharine Kaplan
U.S. Environmental Protection Agency
ENERGY STAR for Set-Top Boxes
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

**Re: ENERGY STAR Program Requirements for Set-Top Boxes Final Draft
Version 3.0**

Dear Ms. Kaplan,

Thank you for this opportunity to comment on the *ENERGY STAR Program Requirements Product Specification for Set-top Boxes Final Draft Version 3.0* ("Final Draft"). Motorola continues to support the ENERGY STAR program, and looks forward to future discussions on this important endeavor.

1. Advanced Video Processing allowance for DTA (line 271)

Motorola questions the reasoning behind High Definition as the only allowance being able to be applied to the DTA base type. The definition of DTA states that it is a 'simple' box whose main functionality is to receive signals and then deliver them to a consumer display. In certain configurations, the video delivery from the service providers to the consumer display may also require advanced video decoding such as MPEG4 decoding. Therefore, Motorola suggests that an Advanced Video Processing allowance be added as an additional functionality to the DTA, with advanced video processing capability.

2. Effective Date (line 349)

In the *Final Draft* the EPA states an effective date of August 1, 2011 for Version 3.0. During the Webinar on December 10, 2010 for STBs, it was communicated that the EPA plans to release a Final Specification the week of January 3, 2011. Motorola asks that the EPA give a standard time period of nine months for product development cycle and revise the effective date to be no earlier than October 1, 2011.

3. IP STB Basic allowance on Version 4.0 (line 264)

The base allowance of IP STB has decreased from 35 kWh/year to 25 kWh/year on version 4.0. Motorola believes that the 35 kWh/year is already a challenging goal to meet, and suggests keeping the 35 kWh/year as the base allowance.

4. Multi-room and Multi-stream allowance on Version 4.0 (line 295)

In the *Final Draft* the additional allowances per Version 4.0 for Multi-room and Multi-Stream – Cable/Satellite have decreased from the previous draft released. These two allowances are crucial in the success of multi-room deployment in the consumer’s home. Motorola suggests maintaining the allowances specified in Draft 2 to encourage manufacturers and service providers to implement multi-room configurations in the consumer’s home.

5. Deep Sleep State (line 87)

In reference to the document on *Proposed Change for Deep Sleep State* Table 1, Motorola seeks clarification on the second column labeled “APD to Deep Sleep Enabled by Default.” Our understanding of this is that in order to take credit for deep sleep state, the manufacturer must have deep sleep enabled via Auto-Power Down (APD). However, in Section 3 of the document, the EPA states that any STB with a user interface requires a button or a switch to be used in order for the box to enter Deep Sleep state. Therefore, Deep Sleep state should not be correlated with or dependent on APD. Motorola suggests changing the second column header to “Deep Sleep Enabled by Default”. In addition, Motorola suggests that the EPA use consistent wording in section E and change the name of Deep Sleep State to Deep Sleep Mode.

6. New Base Type: Gateway STB (line 357)

Motorola appreciates the EPA’s consideration of adding a Gateway STB as a new base type in future revisions. We look forward to the opportunity to work with the EPA, and are eager to be supportive with any additional information on this new STB base type.

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Motorola is strongly committed to the ENERGY STAR program, and looks forward to the release of the final specification for Set-top Boxes. Please contact me if you have any questions regarding this matter.

Sincerely,

/s/ Jason E. Friedrich

Jason E. Friedrich

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