

Pace plc

July 30, 2010

We strongly support the proposal to update the Service Providers' agreement to increase the number of participating companies and the recognition of Energy Star in this market segment

Our detailed response is below

1. The pro-rata purchase requirement is supported for Service Providers joining part way through a calendar year.
2. The additional purchase credit for potentially highly efficient products is supported, but the TEC calculation also needs to be updated to give manufacturers credit for incorporating extra low power circuits, which add cost.
3. The addition of Energy Star endorsement of products that are considered 'independent' is strongly supported and has the potential to significantly raise the awareness of the Energy Star program for STBs amongst consumers and Service Providers.
4. The requirement to test and certify server/client configurations may have complications if the server and client are purchased from different manufacturers.
5. We support the recording of the software version of the STB that was tested to provide a level of traceability. However the software version of the head-end should not be needed and will cause some difficulties, without adding a major benefit
6. With the removal of the higher allowance for Satellite from the version 2 specification there is now an advantage to cable systems as the conditional access (CableCARD) adder only applies to cable networks. As the adder for CableCARD reflects current technology, we suggest that the base allowance for satellite *only* be raised by 6kWh to 56 to reflect the mid point of the system overhead of 0.5-1W continuous power.
7. We support the Home Network Interface allowance being given to Thin Client base types, as this additional functional block is required to make a client function.
8. The single allowance for multistream will still discourage the qualification of larger server products with 6+ tuners, although each individual tuner should be capable of being switched off there will still be a residual system overhead to support the larger processor, memory, storage and PSU necessary. We suggest a lower allowance (in the region of 8) per additional tuner or stream, this will be more stringent for dual tuner solutions (such as a typical single room DVR), but will encourage 4+ tuners to be fitted.
9. There are still significant issues associated with the EPA proposal for independent testing in accredited laboratories, particularly where the manufacturer is not based within Continental USA, which could be deemed to be technical barriers to free trade

Robert Turner MIET
Consultant Approvals Engineer
Pace plc

www.pace.com