

Pace Plc Comments. Submitted March 23, 2010

We generally support the revision of the Energy Star program for STBs and are in agreement with the majority of the proposed amendments; however we do have a small number of comments on the detail.

As the number of service provider partners is still very low, we would suggest that, to get wider recognition of the Energy Star program for STBs, that products which will comply with the new limits under all operation conditions should be permitted to display the Energy Star marking whether or not the service provider is a partner. This could be achieved by measuring the 'on' power only and multiplying by 0.365 to give the TEC, if this is below the limit, then the product will comply.

Table 1 – limits. The limit for thin clients is unachievable. When the original version 2 was released, thin clients were not deployed (and since then non have been Energy star endorsed). As a thin client has now the technical features of an IP box, with home networking (and usually HD) a more realistic allowance would be 50, assuming the needed base allowance for IP plus 20 for advanced home networking (MOCA or WiFi) less an amount for the economy of scale from integrating the two.

The base allowance for IP STBs proposed on Friday appears high. A lower allowance of 42 should be achievable (based on 7W on 1.5W standby)

There need to be an allowance for transcoding or encoding, in addition to the built in allowance for decoding. Advanced products that take an (encoded) signal and re-encode with a higher compression ratio require a significant energy overhead. These will typically be used when distributing signals to mobile devices or to limited size mass storage devices. We would suggest an encoding allowance of 24 (4W on and 1w standby).

We support the creation of a new lower allowance for DTAs and agree with the proposed limits

With the proliferation of home hub products with multi tuners, the additional tuner allowance should be reviewed. For a 2 tuner box an allowance of 16 is greater than should be needed, but for a home hub product with up to 10 tuners serving multiple outlets then the allowance is too low. We suggest that an additional allowance of 9 is given for each additional tuner, significantly tightening the limit for dual tuner boxes, but encouraging higher integrated products. As explained at the meeting additional tuners should be switched off when not in active use, but their presence in a product gives rise to some unavoidable system overheads (extra processing power, extra memory, larger PSU etc).

Section 4.4 b (6) requires all terrestrial receivers to interact with live signals, this is not appropriate for non US companies

Either an allowance needs to be given for new (not yet deployed technologies) or a mechanism needs to be made to effectively exclude them from measurements, so that products containing new technology are not excluded from being Energy Star endorsed, these new technologies will include, but not be limited to, 3D TV and 3D graphics

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