

January 19, 2010

Ms. Kathleen Vokes
US Environmental Protection Agency
ENERGY STAR for Set-top Boxes
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR[®] Program Requirements for Set-top Boxes

Dear Ms. Vokes:

On behalf of the National Cable & Telecommunications Association (“NCTA”),¹ I am responding to the request by the Environmental Protection Agency (“EPA”) at the December 3, 2009 Set-Top Box Specification Revision Kick-off conference call for test data for products that are being considered for inclusion in the next revision of the set-top box specification.²

NCTA supports a voluntary federal program designed to promote the manufacture and use of more energy-efficient set-top boxes and appreciates the opportunity to work with the EPA and industry stakeholders in the development of such a program. Indeed, the cable industry continues to work diligently to develop and deploy more energy-efficient products. For example, smaller silicon architectures, greater power supply efficiency and improvements in components such as integrated silicon-based tuners have resulted in smaller, less energy-consuming devices. Moreover, cable service providers’ transition to all-digital networks has facilitated the removal in some cases of power-hungry analog tuners and other supporting components, leading to an overall reduction in energy consumption by cable set-top boxes.

¹ NCTA is the principal trade association for the U.S. cable television industry, representing cable operators serving more than 90 percent of the nation's cable television households, more than 200 cable program networks, and suppliers of equipment and services to the cable industry, including set-top boxes. The cable industry is the nation’s largest broadband provider of high speed Internet access after investing \$145 billion since 1996 to build two-way interactive networks with fiber optic technology. Cable companies also provide state-of-the-art competitive voice service to over 20 million customers.

² Current set-top box specifications include the ENERGY STAR[®] Program Requirements for Cable, Satellite, and Telecom Service Providers, Partner Commitments, Final Draft – Version 1.0, March 14, 2008, and ENERGY STAR[®] Program Requirements for Set-top Boxes, Final Draft, Version 2.0, March 14, 2008.

When evaluating test data for products that are being considered for inclusion in the next revision of the set-top box specifications, we urge the EPA to recognize that improvements in set-top hardware components, while important, are only part of the energy efficiency improvements needed in order for set-top boxes to qualify under the Tier 2 requirements. Cable operators, for example, working with their software vendor partners, must also develop and fully test the software that will be required to effectively utilize the energy efficiency improvements in hardware. Moreover, these changes to set-top box hardware and software will likely require cable operators to invest in significant architectural and operational changes in their systems in order to successfully deploy the new products to their customers. Throughout this process, cable operators must attempt to reconcile the goal of energy efficiency with consumers' ever-increasing demand for additional set-top features and functionality.

In addition to the time needed to develop, test and deploy the necessary hardware and software, a number of concerns have been raised regarding some of the key criteria in the existing specification—including home network interfaces and tuners and the absence of energy allowance criteria for DOCSIS modems and CableCARDS. Until these concerns are resolved, setting a deadline of January 1, 2011 to qualify products meeting the Tier 2 requirements may be premature. We respectfully request that the EPA work quickly with industry stakeholders to resolve these concerns and then set a reasonable date for Tier 2 compliance.

NCTA stands ready to work with the EPA and other stakeholders in further developing the ENERGY STAR[®] Program Requirements for Set-top Boxes. We urge the EPA to consider holding face-to-face meetings in addition to conference calls. We believe this may be the most effective way to share ideas and quickly resolve the remaining issues. Should you have any questions or seek additional information, please do not hesitate to contact me.

Sincerely,

Andy Scott
Vice President of Engineering

cc: Stephen Pantano, ICF International