



January 16, 2023

Ms. Ann Bailey
Chief, ENERGY STAR Labeling Branch
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Via e-mail: STBs@energystar.gov

Re: Joint Comments of the Consumer Technology Association, NTCA – The Internet & Television Association, and CableLabs Regarding the Proposed Sunset of the Set-Top Box ENERGY STAR Specification

Dear Ms. Bailey:

The Consumer Technology Association™ (CTA),¹ NTCA – The Internet & Television Association,² and Cable Television Laboratories, Inc. (CableLabs®)³ are providing these comments in support of the Environmental Protection Agency's (EPA's) proposal to sunset its ENERGY STAR specification for set-top boxes (STBs).

CTA®, NCTA, and CableLabs are each founding participants in the industry's landmark Voluntary Agreement for Ongoing Improvement to the Energy Efficiency of Set-Top Boxes (VA). Negotiated with the Natural Resources Defense Council (NRDC) and the American Council for an Energy-Efficient Economy (ACEEE), and in effect for more than a decade, the VA features commitments by each of the largest pay-TV service providers in the United States (representing nearly 95% of the U.S. market) that at least 90% of its annual purchases of new STBs will meet prescribed energy efficiency levels. A fourth level of increasingly rigorous efficiency levels became effective on January 1, 2023 under an amendment that extended the program through 2025.

EPA's request for comments correctly observes that the relevance of set-top boxes to national energy policy has declined precipitously since the VA was adopted. The aggregate national set-top box annual energy consumption has been reduced by nearly 60% from 32 TWh in 2012 to 13.7 TWh in 2021, according to the report of the VA's independent auditor cited by EPA's proposal. This 18.3 TWh reduction is more than the power generated by six typical 500-megawatt coal-run power plants in a year. In 2021 alone, consumers saved more than \$2.5 billion on their utility bills and 13 million metric tons of CO₂ emissions from power plants were avoided. Over the nine years of the VA commitments, more than

¹ CTA® is North America's largest technology trade association. CTA's members span the breadth of the consumer tech industry, including many of the world's leading manufacturers of set-top boxes.

² NCTA – The Internet & Television Association is the principal trade association of the cable industry in the United States. Its members include cable operators that deliver the majority of all wired broadband connections to U.S. households, more than 200 cable program networks, and manufacturers of STBs used in cable systems.

³ CableLabs is the leading innovation and R&D lab for the cable industry. Originally established in the United States in 1988 pursuant to the National Cooperative Research Act, CableLabs now has members around the world.

90 TWh have been saved, resulting in nearly \$12 billion in savings to consumers and avoiding nearly 64 million metric tons of CO₂ emissions.⁴ The auditor's report also found that the average weighted power usage of annual new set-top box purchases has fallen by 57% since 2013, from 122 kWh/year to less than 53 kWh/year. Even more relevant to EPA's consideration here is the fact that industry's purchases of new set-top boxes has declined by more than 80% since 2014, from 46 million units down to 8 million units in 2021 due in part to changes in consumer viewing practices and the manner in which video services are delivered. Given that purchases have greatly declined and that new devices are far more efficient, the total energy used by new purchases that could even conceivably be influenced by the ENERGY STAR label is negligible compared to when EPA established a specification for this product category.

An ENERGY STAR specification is less compelling for STBs than many other types of electronics because such a high percentage of devices are purchased by service providers rather than consumers. Service providers that purchase devices in high volumes are sophisticated buyers that conduct more in-depth reviews of the energy efficiency without the need to be informed by an ENERGY STAR label. While ENERGY STAR may be useful and valuable in certain other markets where purchases are made by businesses rather than retail consumers, that is not so for set-top boxes, nearly all of which are purchased by a small number of companies that have made commitments under the VA that ensure that energy efficiency is a criteria in their purchasing decisions.

For all of these reasons, the STB ENERGY STAR specification no longer productively serves a valuable public interest purpose. CTA, NCTA, and CableLabs accordingly support EPA's proposal to sunset the specification on the timeline proposed in its request for comments.

As a final matter, while the STB ENERGY STAR specification is no longer effective, other well-designed ENERGY STAR specifications continue to serve valuable purposes in the home entertainment space in educating consumers and incentivizing the purchase of energy efficient audio and video equipment.

Respectfully submitted,

NCTA – THE INTERNET & TELEVISION ASSOCIATION

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⁴ The Voluntary Agreement and associated reports issued by the independent auditor are posted at <https://www.energy-efficiency.us>.