

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
Northeast Energy Efficiency Partnerships

March 17, 2014

Ms. Katharine Kaplan  
United States Environmental Protection Agency  
Office of Air and Radiation  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: ENERGY STAR Specification for Set-Top Boxes, Version 4.1 Network Testing**

Dear Ms. Kaplan:

This letter is in response to the U.S. Environmental Protection Agency's (EPA) March 7, 2014, letter to stakeholders, proposing refinements to the testing and certification process for ENERGY STAR set-top boxes. In response to the final draft of ENERGY STAR version 4.1, we had raised concerns about EPA allowing manufacturers to test set-top boxes on a network of their choosing. These concerns stemmed from the knowledge that energy consumption can vary between networks and that, as written, manufacturers might have been tempted to test on networks with the lowest associated consumption in order to meet ENERGY STAR requirements.

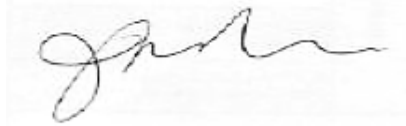
We believe that EPA's proposed modifications to the testing and certification requirements successfully address our concerns. Testing and basing certification on the most consumptive performance will help ensure that a consumer's experienced consumption will be the same as, or better than, what is reported to EPA. Furthermore, by requiring a separate model number for a set-top box/service provider network combination that doesn't meet ENERGY STAR requirements, EPA effectively accommodates those set-top boxes that meet the specified levels on some networks but not others. Because of this, we fully support EPA's proposed changes.

We thank EPA for proposing these important modifications and believe they will provide a vital testing framework from which listed consumption results will better reflect those experienced by consumers.

Sincerely,



Anthony Fryer, Senior Analyst  
Appliance Standards Awareness Project



Jennifer Amann, Buildings Program Director  
American Council for an Energy-Efficient Economy



Claire Miziolek, Residential Program Manager  
Northeast Energy Efficiency Partnerships