

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

February 12, 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 Final Draft**

Dear Ms. Kaplan:

On January 23, 2014, the U.S. Environmental Protection Agency (EPA) distributed the final draft of its ENERGY STAR version 4.1 specification (Version 4.1) for set-top boxes (STBs). This letter is written in response to the draft specification and is submitted on behalf of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and Northeast Energy Efficiency Partnerships (NEEP). These comments supplement those submitted by ASAP and other efficiency advocacy groups on July 10, 2013. In addition to the comments submitted below, the undersigned organizations would like to inform EPA of their collective formal support for comments submitted by the Natural Resources Defense Council (NRDC) on February 6, 2014.

**Testing Alignment – EPA and DOE should fully align the ENERGY STAR STB test procedure with that of the recently completed STB Voluntary Agreement (VA)**

The final draft of Version 4.1 allows industry partners to test STBs on a network of their choosing. This varies from the VA which requires service providers to test models on their own network. Allowing industry partners to select a network creates two concerns.

First, industry has acknowledged that STB energy use can vary for a single model when tested on different service provider networks. As written, Version 4.1 allows industry to simply pick the most beneficial network from which to test a particular model in order to meet the specification requirements. The primary objective of the ENERGY STAR program is to measure the energy consumption of certified products and to convey this information to consumers. Allowing industry partners to pick and choose which network they use to test a STB model strikes at the very heart of this objective by potentially penalizing a conscientious consumer who has selected what they believe to be an energy efficient pay-TV provider and/or STB based on its ENERGY STAR qualification.

Second, as part of the VA, service providers will be publicly disclosing energy consumption values of models tested on their own network.<sup>1</sup> In some cases, these values may differ from those listed on the ENERGY STAR website that have been tested on a different network, leaving the conscientious consumer having to guess what value to believe.

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<sup>1</sup> <http://energy.cablelabs.com>

EPA and DOE have worked diligently to align the STB test procedures and minimize or eliminate consumer confusion. Furthermore, we appreciate that the timing of the VA announcement has left little time to incorporate test method differences into Version 4.1 while still maintaining the specification release schedule. However, for the reasons outlined above, we urge EPA to make this additional change. By doing so, no additional burden will be placed on industry (as they will already be testing models on their own operating system) and the risk of consumer confusion regarding energy consumption values will be mitigated.

**Deep Sleep – EPA should redraft the requirement that STB deep sleep be “enabled by default” to explicitly include both manufacturers and service providers**

To qualify for deep sleep credit, EPA requires that “deep sleep functionality shall be enabled by default.” We agree with this requirement but believe it should explicitly state that it applies to both manufacturers and service providers to ensure that deep sleep is enabled by default when it reaches the consumer.

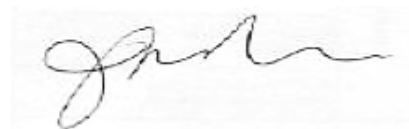
Furthermore, enabled deep sleep functionality exists at the pleasure of the consumer and is essentially one missed recorded show (or some other minor annoyance) away from being disabled by the consumer. Because of this, we join NRDC in supporting EPA’s decision to require that STBs be able to wake from deep sleep to record a pre-scheduled show and then return to a deep sleep state. This function is an essential requirement in order to achieve high consumer deep sleep retention and to realize the efficiency savings associated with this feature. We urge EPA to keep this requirement in the final version of the specification.

Thank you for considering these comments.

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