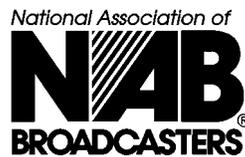




Consumer Electronics Retailers Coalition



October 25, 2006

The Honorable John M. R. Kneuer
Acting Assistant Secretary of Commerce for
Communications and Information
National Telecommunications and Information Administration
United States Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Subject: **Joint Stakeholder Request that Coupon-Eligible Digital-to-Analog Converter Boxes Meet Two Watt Standby Power Limit and Include Auto-Power-Down Feature**

Dear Mr. Kneuer:

Pursuant to the NTIA's recent request for public comments on the implementation and administration of a coupon program for digital-to-analog converter boxes, several parties submitted comments that addressed whether NTIA should include energy considerations in its performance standards. Since the conclusion of the public comment period last month, the undersigned major stakeholders have reached an agreement which takes advantage of an important opportunity for energy savings and avoids state-level regulation of converter boxes potentially detrimental to the nation's transition to digital television. This letter, which supersedes our earlier comments regarding energy considerations, outlines and explains our joint request to NTIA regarding the coupon program and energy use performance standards.

We urge the NTIA to adopt the following minimum energy use requirements for converter box eligibility:

1. Converter box equipment shall use no more than two watts of electricity in "Sleep" state, and
2. Converter box equipment shall meet the auto power down requirement as described below.

Eligible equipment shall provide the capability to automatically switch from the On state to the Sleep state after a period of time without user input. This capability shall be enabled at the factory as the default setting for the device. The default period of inactivity before the equipment automatically switches to the Sleep state shall be four hours. Eligible equipment may allow the current program to complete before switching to the Sleep state.

The default energy related settings shall not be altered during the initial user set-up process and shall persist unless the user chooses at a later date to manually: (a) disable the “automatic switching to Sleep state” capability, or (b) adjust the default time period from 4 hours to some other value.

Sleep state power use shall be measured in accordance with industry standard CEA 2013-A. For purposes of determining compliance, power levels and features may be asserted as follows:

- Sleep state power – Press the power button on the equipment or the remote control 10 minutes after the equipment has been turned on, and
- Auto power down – Determine that the equipment is in Sleep state four hours and twenty minutes after the equipment has been turned on. During this test period, no user activity is allowed (i.e. remote control input, etc.) and no changes may be made to the energy related factory settings.

We continue to support the Environmental Protection Agency’s Energy Star program for digital-to-analog converter boxes and are separately requesting that EPA pursue specifications that maintain the program’s traditional voluntary nature and focus on top-tier energy performers. Specifically, for converter box Energy Star qualification, we are urging EPA to specify eight watts in On state, one watt in Sleep state, and auto power down.

Thank you for your prompt attention to and consideration of our joint request which we believe fully addresses energy use performance standards as they relate to converter boxes and the coupon program.

Sincerely,

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