Working document on possible eco-design requirements for simple set top boxes

Comments from Austria

General Comments:

Overall the proposed implementing measure is appreciated as it considers the major current energy saving potentials and technical options. The following amendments or revisions are recommended:

Definitions

- It is recommended to provide all definitions which are central to the implementing measure in the document describing the specific measure. Although some definitions may be identical to definitions specified in other implementing measures (e.g. stand-by mode and off mode in the horizontal measure on stand-by) they should be provided also in the specific measure to facilitate the use of the documents by stakeholders.

Annex I: Eco-design requirements

- It is recommended to specify the requirements regarding on-mode and standby-/off-mode in a structured table giving a clear overview on the required levels for the different product groups, the functional adders and the different tiers. The current presentation might lead to misunderstandings. For example it is not clearly specified what the requirements for STBs with additional functions are for standby- and off-mode although the same values as for the other categories can be expected.

Requirements for simple STBs with HD and/or additional functions

It has been explained at the Consultation Forum meeting by the experts responsible for the preparatory study that the tier for this product group is set to three years after the implementing measure comes into force because it is unlikely that such devices will appear on the market before that time. The specifications would go into force 4-5 years from now.

- Given the fact that there are no such devices on the market now and manufacturers will develop new products complying with the EUP requirements, it should be possible and recommended to set a first tier to one year after the implementing measure is going into force. Based on the explanation given by the experts responsible for the preparatory study this should have no negative implications for industry since there are no such products on the market yet.

- This revision would be justified as follows: The exact date when the implementing measure goes into force is not known yet. A significant delay could mean that the currently specified tier will not become effective before 5 years from now. On the other hand it is difficult to estimate precisely when the new equipment will be on the market. The market introduction could occur earlier than expected since the lifetime of this specific product group according to the preparatory study is limited.

The definition of the product group treated in this implementing measure is strongly based on the primary function of the devices which is *converting digital broadcasting signals to*

analogue signals. It is emphasized in the preparatory study that the market for this type of equipment will decline strongly after analogue broadcasting is switched off in the EU member states. Based on the preparatory study all member states will have switched off their analogue broadcasting by 2015. According to the forecast provided in the study the complete switch-off of analogue broadcasting in Austria was expected for 2010. Currently it is expected that the switch-off will in a large part be completed in 2008 already. Thus the switch-off in several countries may occur earlier than it was originally expected. This would further reduce the remaining life time of this product group underlining the need for a very fast implementation of the measure to allow significant energy savings.

New types of simple set top boxes

In the preparatory study there are several indications that other types of simple STBs may be expected on the market in the next years like STBs for DVB-T2 and DVB-S2. However this next generation of STBs would not fall under this implementing measure since its primary function would not be *digital to analogue converting*.

- Thus to avoid loopholes for this potentially upcoming product group a continuous market monitoring is essential which should allow a timely revision process for the implementing measure. An alternative way to cover expected next generation simple STBs would be to broaden the product definition in this first version of the implementing measure already which however may be complex to do.

Automatic power down, hard-off and soft-off

Automatic power down is an important requirement to reduce on-mode power consumption at times when the TV-set is switched off. Therefore the proposed measure to reduce this inefficient power consumption to a maximum of 4 hours per day is appreciated. It is understood that simple set-top-boxes can not detect when the TV-equipment is switched off and there is no technology available at present to implement such a function at low cost. However this significant inefficient energy use needs to be further addressed in the future. We propose the following measures:

- A later tier should be considered/evaluated (e.g. 3 years after the implementing measure is going into force) with a requirement that the devices are powered down to standby shortly after leaving one of the primary functional modes. According to expert statements from the preparatory study industry will develop a new generation of products offering new features and technology. Consequently it should be possible also to implement are more sophisticated power down option. Such an option will be especially important if new generations of simple set top boxes will remain on the market for a longer period of time.

- Automatic power down must be implemented by the manufacturer as the default option. Otherwise the risk that it is not implemented by the consumer is to high.

Alternative options to automatic power down are the manually operated power down options also indicated in the preparatory study as for example the typical hard switch.

- Since a hard switch will be rarely used by consumers in addition to the remote control and will only offer a maximum of 0,5W energy savings compared to the required soft-off or stand-by levels we do not see this approach as a primary solution.

- We rather propose the evaluation of alternative energy saving technology as for example a reintroduction of the remote hard-switch and remote controls capable of powering down the TV-set and the STB simultaneously.

User Information

To date requirements on user information are missing in the working document.

- For most appliances treated under the EUP-directive which are used by end consumers it will be important that the directive is also used as a means for awareness raising. In the case of STBs the user should be informed about the energy consumption of the devices in on-mode and stand-by and be encouraged to power down the device whenever possible.

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(on behalf of the Austrian Ministry of Economics and Labour)