european
council for an
energy efficient
economy

eceee comments on the proposed ecodesign requirements for simple set top boxes

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The need for swift implementation

eceee welcomes the proposed Implementing Measures for simple set-top boxes. We think the approach with staged requirements is good.

However, simple set top boxes represent an intermediate technology needed to convert digital into analogue broadcast signals (sales are expected to peak around 2015). It is therefore very important that mandatory eco-design requirements are implemented as soon as possible. Since digital broadcast is currently being introduced all over EU, there is a great need for swift adoption of the requirements given the very large numbers of units sold every year.

Strict requirements in the EU are also likely to have an impact on other regions of the world where digital broadcast is being introduced at a very rapid pace.

eceee proposal

- The first set of requirements should come into force already in 2009.

Verification and enforcement

The proposal provides a procedure to be applied for verification and enforcement. However, instead of using a procedure which is different from procedures suggested by the Commission in other eco-design IM proposals, it would probably be easier to use the same procedure in all Implementing Measures. The form of legislation must also ensure immediate uptake in all Member States.

eceee proposals

- The same verification and enforcement procedure should be specified in all Implementing Measures (if applicable).
- Implementing Measures should be given the form of regulation to ensure a direct and swift application in all Member States.

About the European Council for an Energy Efficient Economy (eceee)

eceee is a non-profit, membership-based European NGO. The goal of eceee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, eceee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of eceee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. eceee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.

eceee promotes the understanding and application of energy efficiency in the energy research, policy and commercial organisations. It offers membership for both individuals and organisations.

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Thresholds

Standard and high definition

The draft implementing measure provides the same thresholds for simple set top boxes with standard definition (SD) and high definition (HD) if they are equipped with additional functions.

eceee proposal

- The thresholds for simple set top boxes with additional functions should be different for standard definition (SD) and high definition (HD), following the logic from the preparatory study on extra allowances for integrated hard disks (+7 W) and a second tuner (+1 W).

Thresholds for set-top boxes with additional features

Although the majority of the currently sold simple set top boxes are merely focused on digital - analogue conversion without any additional functions, recordable hard disks are becoming an increasingly important feature of simple set top boxes and will gain a significant market share before 2012.

eceee proposal

- Thresholds for simple set top boxes with additional features should be introduced sooner than the three years currently envisaged.

Automatic power down

Requirements for an automatic power-down function are crucial.

Consumers often leave set top boxes on permanently because they assume that the set top box also enters standby or off-mode when the TV is switched off with its remote control (or switch). Set top boxes that continue in this on-mode, consume maximum power without delivering any function.

We understand that most simple set top boxes currently in the market cannot detect whether the TV is in on-mode, standby or off-mode and therefore cannot adjust their mode of operation accordingly. However, we consider it of high importance to deploy alternative standby mechanisms that combine both efficient power down functions and high user convenience.

eceee proposals

- A definition for "functional performance" should be introduced in order to bring together the needs for an energy-saving standby function and an acceptable level of user convenience. If this cannot be developed in the first stage, it should be done so for the second stage.

User activated off mode

In order to reduce off-mode power consumption, the user must be able to actively turn off the set top box (i.e. to actively set the STB in off mode). This can be achieved either through remote control or through a real off switch (hard off-switch).

A hard-off switch would most likely reduce the power consumption below the maximum allowed off-mode level and is preferred in addition to any other feature that allows the user to turn off the STB remotely. With the currently allowed off-mode level of 1W, a hard-off switch that reduces power consumption to zero or almost zero would pay for

itself in about three years (assuming it costs €3 to introduce) and can thus be justified from a LCC perspective.

eceee proposal

- The IM should require manufacturers to provide a switch-off function.
- Manufacturers of set top boxes should be required to provide information about the benefits of turning off the set top box manually (i.e. to tell consumers not just rely on an automatic power down with many hours delay.)

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