



NRDC Follow-up Comments on Version 5.1 Draft Final Game Console Requirements

NRDC is writing to express its strong support for the Version 5.1 Draft ENERGY STAR specification for video game consoles. The current version is a dramatically improved version and reflects much of the input provided by NRDC and other stakeholders. Below we provide some minor comments and suggestions on how to further improve this document.

1. **Self-Standing Specification** - As we stated previously, we believe the video game console specification should be a self-standing document. While we understand EPA considers video games to be a subset of computers, we want to make sure the video game portion is self contained and easy for users to access and interpret. The version submitted by EPA almost accomplishes this. A few remaining clean up items are:

- a) line 9 says computers and should say game consoles
- b) section 3 on page 2 refers to computer and should be game consoles. Similar comment on line 82 and 87, and 88.

2. **Media Playback** - EPA has reduced the amount of power allowed for media play (e.g. movie playback) down to 35W. While an improvement from prior version, this value is much higher than the Tier 2 allowable power limit set by EPA in its recently released audio/video ENERGY STAR specification for playback of HD DVD. That limit is only 15W and goes into July 1, 2010 a full two years before the media playback limit in the game console spec goes into effect. As this specification is meant to recognize and award the most efficient models on the market, we urge the EPA to revisit this part of the specification and to establish a number closer to the 15W from its audio/video specification.

The comments below pertain to the test method contained in Appendix A.

3. **Measuring Sleep Power Use** – Throughout the “active mode” testing section, the tester is referred to line 12 which says “Wait one hour and verify that the system goes into a low power state.” This should be changed to say wait one hour and then measure and report the power use. Simply saying confirm the system goes into low power state is insufficient as the device may use less power than in active but much more than the sleep mode requirement.

4. **Measuring Media Play** – The test method as drafted does NOT require testing of the game console’s power use when playing a movie. This language is needed. Media play power use is likely to be higher than that for media idle and media pause. Also EPA should require this test to be done with a loaded movie rather than a “movie or

song” as the other sections allow. That’s because movie playback may require more power than song playback.

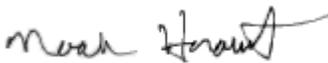
5. Sleep/APD Mode Testing – Line 317 should be game console and not computer. Also the language on line 317 requires the tester to put the unit in sleep/apd mode. This section should be rewritten to explain specifically what to do/not do relative to testing conditions prior to determining if the game console automatically went to sleep and if it met the sleep mode power limit. For example, load and play a game, stop playing, do not touch any button on the console or remote and wait 1 hour. Then measure power use.

6. Media playback APD – The current design of Sony’s auto power down software can result in the device going to sleep in the middle of the movie (eg after 1 hour of no user input). The ESTAR spec appropriately states that the game console may not automatically power down during media play. A corresponding test is needed in the Test Procedure to verify this.

7. Data Form – A simple to use data form should be developed by EPA and required by manufacturers to complete and submit as part of the qualification process. If helpful, the test method document can be updated to include statements like “insert recorded value on Line __ on the attached form”.

In closing we appreciate EPA’s efforts to develop a solid specification for video game consoles. Please do not hesitate to contact me directly at 415-875-6100 should you have any questions or want to discuss our input further.

Respectfully submitted,



Noah D. Horowitz
Senior Scientist
Natural Resources Defense Council