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Additional submitted attachment is included below.

**BEFORE THE
CALIFORNIA ENERGY COMMISSION**

Low-Power Mode

Docket No. 17-AAER-12

**COMMENTS OF
CALBROADBAND AND NCTA - THE INTERNET & TELEVISION ASSOCIATION**

CalBroadband¹ and NCTA - The Internet & Television Association² (“NCTA,” and together, the “Associations”) respectfully submit these comments on the staff report setting forth a draft plan for a Voluntary Performance Framework for Low-Power Modes Version 1.0 (“VPF-LPM”).

The Associations appreciate that the draft VPF-LPM concurs with their prior comments urging the exclusion of small network equipment (“SNE”) that are covered by the industry’s collaboration with Pacific Gas & Electric in the Voluntary Agreement for Ongoing Improvement in the Energy Efficiency of Small Network Equipment (“SNE VA”). The draft staff report excluded SNE as an area of focus from VPF-LPM in recognition of the “significant performance improvement” of SNE under that Voluntary Agreement.

The Associations had assumed that set-top boxes would also continue to be excluded, not only as an area of focus, but from the VPF-LPM altogether. At the inception of this proceeding in

¹ CalBroadband is a trade association consisting of cable providers that have collectively invested more than \$40 billion in California’s broadband infrastructure since 1996 with systems that pass approximately 96 percent of California’s homes.

² NCTA is the principal trade association of the cable television industry in the United States, which is a leading provider of residential broadband service to U.S. households. Its members include owners and operators of cable television systems serving nearly 80 percent of the Nation’s cable television customers, as well as more than 200 cable program networks. Cable service providers have invested billions of dollars in California to deploy and continually upgrade broadband networks and other infrastructure. With CalBroadband, NCTA and its members have long supported the Commission’s objectives in promoting the energy efficiency of consumer electronics.

2017, the Commission excluded set-top boxes by virtue of the Commission’s opening of a set-top box roadmap proceeding on the same day. A 2021 Commission staff presentation listed set-top boxes as “excluded products” from the scope of the low-power mode proceeding on account of the Commission’s separate roadmap.³

Nothing in the new draft staff report indicates a basis or intention to change the exclusion of set-top boxes. However, one of the report’s areas of focus is “streaming media players,” which it defines simply as devices “that process[] online media content and outputs video and audio in real time.”⁴ Modern set-top boxes provide this functionality to consumers who want access to streaming providers in addition to the content they purchase from the service provider. The use of the same device to access both traditional and streaming video is far more energy (and resource) efficient than requiring consumers to use two separate devices. Treating these set-top boxes as streaming media players could potentially subject these devices to two different regulatory frameworks—creating confusion and perverse incentives, and contravening the Commission’s approach in this proceeding. The draft VPF-LPM as written would do just that by bringing many set-top boxes back into the scope of this proceeding as an area of focus.

To avoid that anomalous and harmful result, the VPF-LPM should explicitly exclude set-top boxes from the scope of “streaming media players.” The exclusion should cover any device model that can be used to deliver traditional pay-TV services on a managed service provider network. If the Commission wants to align with the Voluntary Agreement’s definition of set-top box, it can refer to “devices that are capable of receiving digital television services from a coaxial, hybrid fiber coaxial, or fiber-to-the-home distribution system, from satellites, or encapsulated in

³ 17-AAER-12, Staff Presentation for Low Power Mode Roadmap Workshop on August 25, 2021, slide 10.

⁴ Draft VPF-LPM at 11.

IP packets from managed IP distribution networks in order to decrypt or descramble these signals and to decode/decompress for delivery to residential consumer displays and/or recording devices.”⁵

To the extent that the Commission wishes to refresh the record on its continuing basis for excluding set-top boxes, the data shows that the set-top box Voluntary Agreement has proven enormously successful at reducing the energy consumption associated with set-top boxes. The service provider signatories represent more than 95% of the traditional pay-TV service subscriptions in the United States. The total energy consumed by set-top boxes decreased by 73% from 2012 to 2024, and the weighted average typical energy consumption of new set-top boxes acquired by the signatories in 2024 was 65% less than in 2013 even though functionality and features increased (including support for access to streaming media services).⁶ The weighted average standby power for set-top boxes purchased by the Voluntary Agreement signatories in 2024 was only 4.7 watts, compared to 13.5 watts in 2013. The program includes multiple levels of independent verification and measures to assure transparency. The American Council for an Energy-Efficient Economy (ACEEE) continues to assure the rigor of the program through its active participation as an “energy advocate” signatory, and the Associations commit to continuing to update the Commission on the progress under this agreement.

⁵ Voluntary Agreement for the Ongoing Improvement to the Energy Efficiency of Set-Top Boxes, Annex 1, definition 13, available at www.energy-efficiency.us. The Voluntary Agreement definition has a second part that limits its scope to devices purchased by the service provider signatories. That limitation should not be part of a Commission carve-out from the scope of streaming media player, just as the Commission’s exclusion from SNE as an area of focus similarly did not limit its exclusion to the device units that were reported by service provider signatories under the SNE VA.

⁶ D+R International, 2024 Annual Report for the Voluntary Agreement for the Ongoing Improvement to the Energy Efficiency of Set-Top Boxes, available at www.energy-efficiency.us. The 2025 report is expected to be released later this summer.

The Commission in any event does not need an additional data collection to study the energy usage of set-top boxes or SNE.⁷ A complete set of standby power test results (sleep mode for set-top boxes and ready-mode for SNE) for every model of set-top box and small network equipment purchased or sold by the Voluntary Agreement signatories for more than a decade is available through the independently-verified annual reports posted to the program website, www.energy-efficiency.us. Those measurements were taken using the widely used ANSI/CTA-2043-B test method standard for set-top boxes and ANSI/CTA-2049-B for SNE. Any consideration of these devices categories should use test results derived from these consensus test methods instead of the DCP test method, for the same reason that the draft VPF-LPM would use the ENERGY STAR test method for imaging equipment.⁸

Accordingly, the Associations respectfully request that the Commission reaffirm that set-top boxes (i.e., devices that are capable of receiving video from a managed service provider distribution network) are excluded from the scope of this proceeding.

⁷ The draft report notes that while SNE is not in focus, “the CEC welcomes data from SNE submitted to the CEC according to the DCP-LPM.” Draft VPF-LPM at 14.

⁸ Draft VPF-LPM at 11 (because there is “an established test method and with significant performance data already available,” “[t]o avoid redundant testing and take advantage of the well-recognized data within the ENERGY STAR Program, the CEC requests that stakeholders submit data to the CEC for imaging equipment in accordance with the test method established by ENERGY STAR”).

Respectfully submitted,

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