

## **Comments on Draft 1 Version 2.0 ENERGY STAR External Power Supplies Specification**

### **Submitted by:**

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### **Comments:**

Dear Robin,

Following some comments on the Draft 1 specification for External Power Supplies.

#### **1st Comment**

EPA had the target to have the power factor requirement in line with the EN 61000-3-2, however EPA defined 75W output power and EN defines 75W Input power as a limit for the application. Therefore EPA should be changed to 75W input power as a requirement for PF > 0,9.

#### **2nd Comment**

Section 1:

3) Energy-Efficiency Specifications for Qualifying Products:  
B. Power factor correction (line 133)

Draft1\_V2.0\_EPS\_Spec\_Oct07 requires a power factor of > 0.9 for 100% rated load, if the nominal output power is > 75W. This requirement was transferred from the PC EPA specification V4.0, as 90% of the products meet this requirement.

The PF(power factor) of 0.9 would mean, that a discrete boost stage would be necessary to achieve such high power factors. However currently single stage topologies are used, with have higher efficiency than 2 discrete power stages (PFC stage & conversion stage). Therefore a PF of 0.9 requirement would imply a loss of efficiency, which is not intended by EPA.

Fujitsu Siemens Computers suggest to change the power factor requirement, as highly efficient AC-Adapters are using different topologies compared to PC power supplies. Therefore we suggest to limit the power factor only in the same way as this harmonic current is limited by EN 61000-3-2. (75W input power and harmonic current limitation)

#### **3rd Comment**

Please consider, that the energy-efficiency is different between 115V and 230V. Fujitsu Siemens Computers suggest to separate the energy-efficiency requirement for 115 V and 230V.

- 230V > 86%  
- 100V/115V > 87%

Best regards,

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