

Comment from METI on
Computer Specification-Final Draft (September 22, 2006)

Following is METI's comment on Computer Specification-Final Draft distributed to stakeholders on September 22, 2006.

Supply Voltage for IPS and EPS testing

Currently, both IPS and EPS test methods specify 115V and 230V for supply voltage. However, we would like to seek your understanding that 100V be the one for products sold at Japanese market. It was already discussed in May, 2005, and we believe that it is a confirmed issue now.

Besides, including 100V in IPS and EPS test conditions will build a consistency with related other test conditions, such as for computers and imaging equipments.

We strongly ask for including 100V in IPS and EPS test conditions. As long as IPS and EPS are used with computers (or imaging products) shipped to Japan, both of them should be tested under 100V condition.

WOL Requirement

Some unclearness still remains regarding WOL requirement. Please provide your advice for the following case:

A model satisfies the relevant standby level, sleep level with WOL enabled and sleep level with WOL disabled. If products of this model are shipped through enterprise channels with WOL disabled, do they fail to qualify ENERGY STAR?

Final draft (Section 3.A.3) explains that WOL requirement for products shipped through enterprise channels intends to identify machines used in a managed client/server environment. Against this intent, we also need to pay attention to the fact that not all office computers are used under such managed environment. For some computers, enabling WOL at shipment is unnecessary at all.

Qualification of a model should not be influenced from WOL enabled or disabled at shipment. Therefore, the model in the above example should qualify as ENERGY STAR.

Concern for Power Consumption Variability of Electronic Components

Computers' electronic components (CPU, etc.) are supplied by electronic component vendors, and their variability of power consumption within single model is beyond control of computer manufacturers. The influence of these components on computer's power consumption is concerned when qualifying it as ENERGY STAR.

According to the example presented in Section 4.A. of Final Draft, the model qualifies as ENERGY STAR, if two units of it are then tested at 47W and 49W. Still, this model holds a potential to exceed 50W in future due to the power consumption variability of its electronic components.

In the above case, is manufacture of the model allowed to qualify it as ENERGY STAR, regardless of the future concern? Please provide your advice.

User Education Requirement

This requirement seems holding an attribution which belongs to Partner Commitments, which is applicable to US Partners. Therefore, we believe that this requirement needs some modification in order to be suitable to Japanese market, while maintaining the intent. Although we raised this issue in METI's comment on Draft 3, we still have not heard any response from EPA about it unfortunately. We would like to have EPA's understanding on it. If you see any problem, please let us know.