May 8, 2006

JEITA Comments on ENERGY STAR Program Requirements for Computers — Draft 2

JEITA International Energy Star Committee

*The JEITA International Energy Star Committee has the following comments on the ENERGY STAR Program Requirements for Computers — Draft 2.

Partner Commitments

Commitments
• Although this section states "[partners must] qualify at least one ENERGY STAR computer model within one year," this requirement should in fact be optional. The reason for this is the very real possibility of manufacturers appearing that cannot qualify a computer model.

Labeling
• In this requirement, displaying the Energy Star mark on packaging and product literature such as manuals should be optional.
Reason:
(1) Since idle power is a critical setting, a product's qualification or disqualification is dependent on the BTO/CTO configuration (optical, hard drive, etc.). Consequently, meeting this requirement is impossible.
(2) When requiring labeling on the product, it should be permissible to display the Energy Star mark on the device nameplate. (Affixing individual labels on the product is a waste of resources.)

Electronic Labeling
• The partner should decide the size and display time of electronic labeling.
   There is a significant possibility of conflicting with Intel's on-screen branding (OSB) regulation restrictions.

Eligibility Criteria

1) Definitions

Computer Types
• We would like to see the category clarified for computers that have a separate main unit and monitor where the power supply is housed in the main unit and supplies DC power to the monitor.
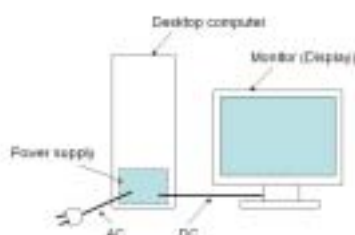
3) Energy Efficiency and Power Management Criteria

(2) Operational Mode Efficiency Requirements
• In Category A, "HDTV capable video outputs" should be changed to "HDTV capable outputs."
  This change should be made because the possibility exists that non-video HDTV outputs will
  appear.
• The criteria for categories A and B must be revised since there are almost no desktop computers
  that can meet the criteria of Category B. A Pentium 4 desktop with a minimal configuration still
  consumes about 70 W.
• Notebook computers should also be divided into categories like Category A and Category B for
  desktops because there are models with audio/visual functions.
      Example: Category A — notebooks with TV tuners, etc., Category B — all other notebooks

Table 1: Tier 1 Energy Efficiency Requirements and **Table 2: Tier 1 Capability Adders for Sleep and Standby**

Notebook Computers
• We would like to see the rationale for the 20 W Idle State requirement.
• We would like the Off Mode requirement be made 2 W.
• We would like the WOL criteria in Table 2 to be changed to +1.0 W.
  Reason: WOL function is now consuming approximate 500mW including DC-to-DC losses.
  Assuming 50% of AC-to-DC efficiency with sleep/standby load (very light load), total power
  consumption would be 1000mW. Therefore, it is considered +1.0W of allowance is reasonable
  for WOL.
• Manufacturers should not be forced to enable WOL as a default when shipping products. We
  strongly oppose this requirement.
   Reason: When notebooks operate on battery power, enabling WOL increases the S3 power
          consumption and thereby reduces the batteries' retention time.
          Enabling WOL on desktops as well incurs needless power consumption for customers
          who do not need WOL. Customers who truly wish to use WOL are sure to enable
          WOL even if WOL is disabled by default.

APPENDIX A: ENERGY STAR Test Procedure for Determining the Power Use of Computers in Standby, Sleep, and Idle

Idle Mode Testing
• The provision "Exactly five minutes after the computer was switched on" should be changed to
  "after sufficient time has passed for the system to stabilize in the idle state."
  Reason: In some cases, a virus scan program launches immediately after startup, causing the
  hard drive to continue to run in the background.

Rationale for Data Analysis of Idle Power Levels for the Draft 2 ENERGY STAR Computer Specification
• We would like to see the numerical basis for the statement: "… research has shown about a 15%
decrease in Idle power using an 80% efficient power supply over a conventional model."