July 21, 2006

Comment from METI on
Draft 3-ENERGY STAR® Computer Program Requirement (Version 4.0)

P2: Labeling Requirement

We are going to ask for easing of the labeling requirement.
From the standpoint of promoting ENERGY STAR, implementation of appropriate labeling is very important. In such case, however, its effect on partners such as cost increase should be considered. We would like to see some amendment in the next draft.

P9: (1) Power Supply Efficiency Requirements
Computers Using an Internal Power Supply

We are going to ask for postponing of effective date for internal power supply requirement.
Industry in Japan is concerning that a preparation period before the effective date is not enough for development of internal power supplies and that it leads to cost increase. Therefore, we will ask for postponing the effective date which is based on internal power supplies' development cycles.
Here, we would like to confirm if Internal Power Supply Test Procedure has already been finalized and ready for use. According to the website (http://www.efficientpowersupplies.org/ips_workshop.html) indicated in Draft 3, the final was planned to be released on March 2006 but seems to be unavailable yet.

P9: (2) Operational Mode Efficiency Requirements
Desktop Differentiation

Please clearly indicate the computer types addressed by this differentiation.
Desktop differentiation is applied to desktop computers, integrated computers and game consoles. It seems that there is no clear explanation about it in this section, but we think it is necessary to avoid confusion.

P10: Notebook Differentiation

We are going to ask for fair treatment on notebook differentiation.
The market for advanced notebooks is considered to be large in Japan. Thus, we would like to see an appropriate decision regarding the notebook differentiation, based on the data to be submitted by Japanese industry.

P13: (3) Power Management Requirements

Shipment Requirement regarding WOL

Please clarify reasons for requiring computers to be shipped with WOL enabled if they are sold through enterprise channels.

Having WOL enabled as a default should not be mandatory, in order to reduce unnecessary energy consumption by enterprise users who do not need it. We would like to have clear definitions of enterprise channels and others (such as selling directly to consumers) as well as reasons for differentiating these selling processes.

P13: (3) Power Management Requirement

User Education Requirement

This requirement seems containing US-specific items. Please provide EPA's thought on how this requirement should be applied to qualified products shipped within Partner Countries (i.e. other than U.S.).

P18: II. Testing Requirement

Test Conditions

We are going to ask for acceptance of using 100 VAC for testing computers to be shipped to the Japanese market.

If EPA has an intention to unify the test conditions for the markets of 100 V and 120 V, Input AC Voltage should include 100 VAC. At the same time, in consideration of computers shipped to Japan, it should be noted somewhere in this Computer Specification that 100 VAC test condition is admitted for both internal and external power supply tests.

P19: III. Test Procedure

d. Power to wireless radio…

We are going to ask for criteria taking into account wireless radio devices.

It is expected that power consumption is different with active/inactive wireless radio devices. To achieve market satisfactions for both products with and without the devices, it is recommended to investigate the need for power allowance or other means to address them.