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Dear Katharine,

The Draft 3 Computer specification for Energy Star omits an important definition from the descriptions of mid-range and large servers. For completeness of the specification and to address a growing trend in server safety certification, it would be beneficial to address this omission.

Computers that are based on Server hardware components (not Desktop components) and that perform Server functions of hosting applications for network-attached client computers may be required to be placed on the market as Class B products if it is likely that the server will be installed in a location that will expose the general public to electromagnetic emissions or cause electromagnetic interference with nearby electronic equipment. The upgrade from Class A to stricter Class B EMC standards entails significant design and manufacturing cost and is accomplished by the addition of EMI-suppressing hardware components.

For purposes of this specification, the definition of Servers that have been upgraded from Class A to Class B EMC is limited to servers based on server hardware components with 1 or more processor sockets on board.

The Draft 3 text reads as follows:

- 241 This specification does not cover mid-range or large servers, defined for purposes of this
242 specification as:
243
244 • Designed and placed on the market as a Class A product per EuroNorm EN55022:1998 under
245 the EMC Directive 89/336/EEC and designed and capable of having a single or dual
246 processor capability (1 or greater sockets on board);
247
248 • Designed and placed on the market as a Class B product per EuroNorm EN55022:1998 under
249 the EMC Directive 89/336/EEC and designed and capable of having a *minimum* dual
250 processor capability (2 sockets on board).

Proposed additional bullet to be inserted between the existing bullets:

- Placed on the market as a Class B product per EuroNorm EN55022:1998 under the EMC Directive 89/336/EEC by specific EMC hardware upgrade of a Class A product and designed and capable of having a single or dual processor capability (1 or greater sockets on board);

EFI welcomes the opportunity to discuss this topic with EPA and with other stakeholders. Please contact me with any follow-up questions or comments.

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