

Comment from METI on
Proposed Levels for Final Computer Specification (August 26, 2006)

Following is METI's comment on Proposed Levels for Final Computer Specification distributed to stakeholders on August 26, 2006. This document includes the comment about not only the proposed levels but also Draft 3. Releasing the final draft by the end of this month, we expect you to take all of our comment into consideration.

ENERGY STAR as an International Labeling Program

As it is known, ENERGY STAR is a labeling program now spread internationally. Therefore, we expect computer specification to be the one which shows concern for markets of other implementing countries as well as that of U.S. It is very important for ENERGY STAR to take them into account, if it continues to be an internationally implemented program. As for Japanese market, we would like to ask for your reconsideration of the following issues.

- **Supply Voltage for Testing:** Regarding the test for products which will be sold in Japanese market, the supply voltage should be 100VAC. In Draft 3, 115VAC is given for products to be qualified in a market using 100VAC. However, this is inconsistent with the policy that products shall be tested based on the market in which they will be sold and promoted as ENERGY STAR. Thus, since the standard supply voltage of Japanese market is 100VAC, we would like to ask for the revision of this part.
In May, 2005, we received a proposal from ICF Consulting regarding this issue. They suggested applying supply voltage of 115VAC for testing products to be sold in markets of 100V/120V; however, we asked them to keep 100VAC test condition for Japanese market. As an outcome, 100V is maintained in the test condition in Imaging Equipment Specification. We would like to see the same approach for Computer Specification.
- **TV Tuner:** As for computers with TV tuners, appropriate category and criteria should be given. The percentage of computers with TV tuners in Japanese market maintains an upward trend now and will continue to do so after the effective date. In order to avoid that having additional features puts the product at a disadvantage in qualification, a category for computers with TV tuners should be reviewed.

Validity of Data used for Proposed Levels

With respect to the dataset from which those proposed computer levels were derived, we would like to make 2 comments as shown below.

- **Insufficiency of the Number of Models:** We would like to raise a question about the validity of this data set, whether it is appropriately reflecting the future markets when the specification becomes effective. Following EPA's direction, industries submitted the data of highest models in the current markets. Although the data set would be useful to estimate the future technological development of energy-saving, such way of collecting data might limit the number of models in a data set. It is natural to assume that low or middle performance models will remain in the markets on the effective date, which is about 10 months from now. Therefore, we believe that verification of this data set is necessary, in order to prove its validity for being a basis of criteria determining top 25%

in respective markets.

- **Models with ULV (Ultra Low Voltage)-CPU:** According to the values shown in the data set, it is assumed that models with ULV-CPU are included there. Because of its specialized feature in energy-saving and its low penetration rate, the models with this CPU should not be treated together with other computers. Therefore, we recommend either to set an independent category for them or to remove them from the data set.

Requirements Other Than that for Energy Efficiency

- **Internal Power Supply:** As EPA implies in the document, to improve efficiency of internal power supply is an effective way for a product to meet criteria. Therefore, it is assumed that manufacturers will choose to do so on their own will. For this reason, we believe that it is not necessary to give an independent efficiency requirement for internal power supply, which is a component of computer, in Computer Specification. What we need to achieve is to reduce power consumption of computers, so the means for it shall be at manufacturer's own discretion. We would like to ask for either removal of internal power supply efficiency requirement or postponement of its application taking the development cycle into consideration.
- **WOL:** We would like to confirm with you that computers shall be tested and reported as shipped. We presume that models shipped with WOL disabled are tested and reported with WOL disabled, even though they are sold through enterprise channels. Especially for notebooks, since they are often used without connecting to inter-office LAN, WOL enabled as a default setting is not necessary. Because of such unnecessary WOL setting, it results in faster drain on battery-power. This is not acceptable from the energy-saving point of view. Therefore, we look for your clarification that the line "models sold through enterprise channels...shall be tested, qualified and shipped with WOL enabled" is only an example. Otherwise, it shall be removed from the specification.

Number of Units Required for Test

- **Eligibility Criteria and the Margin:** Draft 3 does not include the part explaining this issue; therefore, we are expecting to see a clear statement of it in the next draft. We support the way employed in Imaging Equipment Specification or Monitor Specification, in which the number of units required for test is determined from the test result of the first unit.

Labeling Requirement

- **Labeling on BTO Products:** In case of BTO products, BIOS, pre-installed media, and enclosed printings are shared among the same model (or model series). Thus, the labeling requirement provided in Draft 3 is unrealistic; taking into consideration that discrimination of qualified/non-qualified models is extremely complex in the course of production due to multiple variations in a series. We would like to ask for moderation of the labeling requirement.

Up to now, we have not received EPA's response to our comment on Draft 3 submitted in July. We are looking forward to seeing EPA's response to both of our comments together with the next draft.