

September 26, 2008

JEITA's Comments on "ENERGY STAR Program Requirements for Computers — Version 5.0, DRAFT 2"

JEITA International Energy Star Committee
(Computer Group)

1. Request to revise the product categories

- JEITA strongly opposes the dramatic changes made to the product categories. Many international Energy Star qualified products will no longer qualify because of the category changes and not because of more stringent program requirements. The EPA should consider the impact on existing qualified products caused by disrupting category continuity.
- JEITA does not oppose the more stringent program requirements or the category contents. Nevertheless, the reasons and data basis for the EPA's proposed category changes are not known, and the EPA has not presented details that can be explained to both consumers and industry.
- Should there be intent for the EPA to compensate appropriately for the more stringent criteria and product category integration, JEITA feels it is appropriate to apply adjustments (+ or -) from Ver. 4 criteria and Ver. 4 categories in the same way as the capacity adjustments for memory capacity.
- If the categories are to be changed, we would like the EPA to examine setting categories A, B, and C for notebook computers, similar to those for desktop computers, in consideration of future notebook diversification.

2. Request to re-examine the capability adjustments based on system memory capacity

- It is true that the power consumption depends on system memory configuration, but the capability adjustments for system memory may cause a problem that whether ENERGY STAR qualified or not depends on memory configuration even in the same product (or product family). And it's very difficult to explain it to customers. To solve the discrepancy, we shouldn't consider it for each memory configuration, but a product family. JEITA requests to add below supplemental provision as a solution.

"Regarding memory configuration in the measurement and at the shipment, if the power consumption measured in the maximum memory configuration meets the requirements, the product is qualified in any memory configuration at the shipment."

3. Line 502 and elsewhere

Annual Energy Consumption (Desktop and Notebook product categories)

- JEITA requests that this be changed to "Typical Energy Consumption (TEC)"
- The draft frequently uses the term "Annual Energy," which invites misunderstandings by consumers in Japan. "TEC" should be the term referring to eligibility criteria in all cases, whereas the use of "Annual Energy" should be limited to supplementary explanations.

4. Lines 520–529

Table 2: Operational Mode Weighting & Note

- Does Intel vPro (AMT) fall under "proxying"? Please supply a FAQ that includes this question.
- Supporting arguments for consumers and others are needed for the operational mode weighting figures. The supporting data, however, cannot be read from the LBL materials released by the EPA. JEITA asks that the EPA supply this supporting data.