

In Win is a large computer chassis and power supply manufacturer headquartered in Taiwan. In the leading supplier worldwide to regional computer OEMs and channel based system builders. In Win is also the largest supplier of computer chassis and power supplies to customers who sell into the government and education marketplace worldwide. In Win has also introduced a new engineering program worldwide that has quickly established it as the leading ODM supplier of Energy Star solutions for channel system builders in the United States. In Win IACP program has reduced the cost of developing ENERGY STAR compliant solutions for existing ENERGY STAR partners and more significantly has enabled a new level of channel system builders to start to become ENERGY STAR partners and for the first time offer ENERGY STAR computers to their customers.

In Win operates ENERGY STAR test sites in Taiwan and Los Angeles. These sites are used to do ENERGY STAR compliance testing for our customers worldwide. These sites have recently been commissioned and represent a significant investment by In Win. These sites are used to produce compliance data for a large number of smaller customers worldwide. The program developed by In Win specifically provides the engineering and data to enable smaller computer builders in the channel to offer ENERGY STAR compliant computers where previously these companies could not. In Win does have real life examples of where our program has enabled a regional supplier of computers to school through out the Midwest to be able to offer ENERGY STAR branded systems where in the past they have not been required to or able to. In Win has other examples of this success in Canada. There are a large number of channel based system builders that currently do not offer ENERGY STAR systems but with In Win's investment in test sites have been able to offer the testing and knowledge expertise these companies have needed to be able to offer and build ENERGY STAR systems.

In Win asks the EPA to make sure that any changes to the program support the continued use of existing test facilities established by manufacturers. The facilities represent significant investments by these manufacturers as well as play a key role in developing and maintaining compliant solutions.

In Win understands the EPA situation but cautions about over reacting to the GOA report.

About In Win

IN WIN Development Inc., an ISO 9001 manufacturer of professional computer chassis, server chassis, power supplies and storage devices, is the leading provider of enclosure solutions to system integrators worldwide. Founded in 1986, IN-WIN provides high quality product that conform to all safety regulations, as well as unsurpassed customer service. Our slogan "Contemporary and Innovative" serves as the foundation of not only our product development but also our attitudes in serving and catering to our strategic partner's wishes. We take the "im" out of "impossible"...

...A brand without persistence is only a name.

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In Win is concerned about the effect of the added cost to doing ENERGY STAR compliance. This concern is specifically large for smaller regional system builders who have smaller volumes to amortize the test costs over.

In Win asks the EPA to preserve the current policy of allowing the worst-case configuration to be used for the compliance submission and then allowing similar lower power configurations to be declared compliant without having to submit the alternate configuration to a lab for testing. If all configurations possible must be tested in a lab then the cost of compliance will scale outside the cost that a product can have amortized and remain competitive. The end result will be fewer choices in systems and optional configurations.

Companies that have invested in the cost of purchasing the equipment and training the staff to perform the testing required to determine and report compliance with ENERGY STAR are companies that are the most unlikely to report incorrect data. These companies have invested significantly in the brand and are just as concerned about fraudulent or deliberate manipulations of test data. There will remain a market surveillance aspect of the systems reporting compliance with ENERGY STAR and this process does work. Recently a company had incorrectly reported ENERGY STAR compliance as part of their EPEAT registration. A competitor noticed this and the scenario was investigated and resulted in removal of the system incorrectly declared to comply.

In Win would prefer to have an audit of the test results for all of our testing done on a annual or semi annual basis rather than be required to spend the money required to bring our test sites into compliance with ISO17025.

In Win would offer the following cautionary observation. In Win uses a number of labs in US, Canada and Taiwan to do IEC61000-3-2 and IEC6100-3-3 testing. This is a test that utilizes a similar range of test equipment. It is In Win's experience that even ISO 17025 labs repeatedly do this testing incorrectly. The labs we use are not small inexperienced outfits but major labs used by many of the prominent brand names in the industry. In Win does not believe that utilizing an ISO 17025 lab will produce more accurate or more reliable test data than our own in house test sites.

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