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To: Duff, Rebecca M.
Subject: very late server draft comments
Importance: High

ITI- The Information Technology Industry Council

The following were identified as issues with the latest draft, many of which were raised in the recent conference call:

- Base idle limits are too low (i.e., table 3), due in large part to the fact that they are based on SPEC data, which tends to be tilted toward lower-featured systems
- As a consequence of the last point above, the EPA data is distorted and should not be used to as the basis for developing a spec
- We are very concerned with the cycle time for evolving through three standards setting activities for servers by October, 2010. This is extremely burdensome on industry.
- It is still unclear if an operating system is required to be shipped or not.
- Metrics reporting by the server on utilization, air inlet temperature and power consumption may not be real time given latency of server workload and communications delays.
- Single socket systems with 1, 2 or 4 cores are treated as the same with respect to idle regardless of performance.
- Manufacturers should be given the option of providing electronic or web based information (OS and drivers information) instead of printing documentation to accompany servers.
- The February 1 effective date is unreasonable and has the potential of encouraging government agencies to waive ES requirements for enterprise server purchases. While implementing new product specs on "day 1" may be the norm for other ENERGY STAR initiatives, it does not make sense to do so with enterprise servers, particularly given concerns expressed by the EU and industry. EPA has not offered a sound rationale for ignoring international and industry partner recommendations.

Possible solutions:

- Create product categories a la the Computer 5.0 spec
- Use the SPEC benchmark solely to measure idle, i.e., no publication requirement
- Put four processor systems on the same timeline as blade servers
- Adhere to the general principles of Energy Star by allowing a nine-month transition period between the date publication and the effective date of implementation of the new enterprise server spec