

July 21, 2006

United States Environmental Protection Agency
 Washington DC 20460
 Office of Air and Radiation

Dear Sirs, Energy Star Program,

Fujitsu comments on ENERGY STAR Computer Specification-Draft3

Fujitsu, as a member of the JEITA International Energy Star Committee, is supporting the Energy Star of computer Specification. The following is a backup for the comments via JEITA, and explanation of rather Fujitsu specific matter yet we believe what's common in this industry.

1. Page7 Line 282 to 300 “ ”J Workstation••• “

We see EPA is trying to classify PCs. We worry about the definition of the “Workstations”. It looks out of date already, and when the specification is going to public, it won't be suitable. Defining this is so difficult even for today, and more for the future. As this terminology is more like marketing issue, what we (or any other PC vendor) might call and sell as a “workstation” is not fit in the EPA defined one; there can be some confusion or too much complication especially for the manufacturers.

Considering the proportion of “workstations” in the PC market, we believe, and think it's reasonable enough, that the definition could be “The PCs sold as workstation explicitly”.

Thinking about “Energy saving” the goal of ENERGY STAR PROGRAM, you want to have more of lower-power-consumption workstations (yet can be high performance) available in the market. We think the market should define what workstation is.

2. Page 9 3) Energy Efficiency and Power Management Criteria,
 Line 349 to 350 “Computer Using an Internal Power Supply”

Please find the attachments to see what/how the difficulties are, at least, for Fujitsu today. The efficiency data of the current technologies (with reasonable costs) are presented.

We Fujitsu have been trying to find improvements in efficiency of internal PSUs according to the “Computer framework, August 2005” and “Draft 1, January 2006”. But we think it's not possible to meet Draft-3 tier 1 requirement, to be honest.

As the schedule in the attachment, we Fujitsu and the PSU vendors we've been talking with, think that we need time till year 2007 even for planning. The following is what we think, “still difficult but we can try”.

Tier 1 (2007/7)	:	
65 %	at 20% load	< 200W rated output PSU
70 %	at 20% load	≥ 200W rated output PSU
75 %	at 50% load	≥ 200W rated output PSU
75 %	at 100%load	≥ 200W rated output PSU

Tier 1.5 (2008/4) or Tier 2(2009/1) : (yet to be studied till Jan. 2007)

70 %	at 20% load	< 200W rated output PSU
75 %	at 20% load	≥ 200W rated output PSU
80 %	at 50% load	≥ 200W rated output PSU
78%	at 100%load	≥ 200W rated output PSU



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Sincerely.