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SUBJECT: comments on Draft 3 of Version 4 of the ENERGY STAR® Computer Specification

Thanks for the opportunity to submit comments on Draft 3, and for the extra time to file. As always, we will be happy to provide additional details or respond to any questions you may have. ITI's comments follow:

1) Partnership Agreement: Electronic Labeling

Lines 84-8, revise the last two sentences of this section as follows:

The electronic mark will display for a minimum of 5 seconds, unless the product turn-on process does not allow this. In that case, the mark should show for as much time as possible.

Also, delete the text in lines 89-90 and replace it with the following:

The ENERGY STAR mark must be legible. Manufacturers will submit their electronic labeling scheme to EPA prior to implementing it.

Rationale: A 10 second minimum display could cause user frustration since it is likely to prolong the boot-up process. Also, the BIOS manufacturer and/or amount of system memory could cause the display to vary one way or the other. A five second display of the ENERGY STAR logo would be sufficient to make a brand "impression" upon the end user(s).

2) Alternative to Electronic and Other Product Labeling/Educational Materials

ITI would like to propose the specific inclusion of an alternative approach to ENERGY STAR branding: the inclusion of an ENERGY STAR icon on the computer "desktop" that would serve as a shortcut to the program educational materials outlined beginning at line 452. This would also serve as a substitute to including the logo in product materials (line 94).

Rationale: This would be a more cost-effective approach for industry, and would potentially generate a greater number of brand "impressions" with all of the users of the equipment.

3) Definitions: Workstation

On line 285, after the date reference (12/97), insert the following:

or based on a comparable calculation using annual failure rates

Rationale:

- Bellcore calculation method not readily available
- Component coefficients are time-consuming to obtain from each supplier
- Supplier data accuracy is questionable or may be out of date
- Bellcore “mean time between failures” (MTBF) will be shorter as a workstation becomes more complex [more parts]
- Annual failure rates are readily available
- Annual failure rates are a more accurate description of MTBF

4) Energy Efficiency and Power Management Criteria – Note at line 381:

ITI supports categorizing high-end notebooks as mobile workstations. A potential starting point would be to define a Mobile Workstation as follows:

Category A (Mobile Workstation) Definition: marketed as a Mobile Workstation, and must have at least 2 of the following to qualify:

- Minimum 15 in. Display
- Two or more processor cores
- 2GB or more of installed DRAM
- Greater than 128 MB of dedicated graphics memory separate from system DRAM

Category B Definition: anything not qualifying under Category A:

In Table 1: Tier 1 Energy Efficiency Requirements under notebook product type:

- Standby (Off Mode): $\leq 2W$
- Sleep Mode: $\leq 3W$
- Idle State:
- Category A: 30W
- Category B: 20W

Rationale: While Mobile Workstations make up a smaller portion of notebook sales, energy savings and ENERGY STAR compliance remain a concern of our customers.