

HP Comments on Preliminary Draft ENERGY STAR Spec. Ver. 4.0 for PCs

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Ref. Par. No.	Subject	PSG PS Comments to DRAFT Ver. 4.0 Standard
1) F	Definitions	Unnecessary to include definition for “ Active Mode ” as there is no common agreement within industry related to test methods / standardized hardware and software configurations (we do not support testing and reporting to the SKU level).
1) G	Definitions	Unnecessary to include definition for “ Idle Mode ” for the same reasons stated for “ Active Mode ” above.
1) I	Definitions	Definition for “ Standby Mode ” should include reference to “Off Mode” and “Apparent Off Mode” to be consistent with other related Eco Labels and standards commonly used in Europe. (Blue Angel, IT Eco Declaration, TCO, EU Flower, etc.)
1)	Definitions	Please consider defining Workstations as a separate product category (not included with PCs). We can work together on a definition of Workstations in future drafts of this standard.
2)	Performance Specs.	We believe that it is not appropriate / justified to include a requirement for transition time in X seconds from a low power sleep mode to active or on mode. Recovery time does not apply to energy efficiency/savings.
2)	Performance Specs.	For energy efficiency metric “ Standby Mode ”, include reference to “Off Mode” and “Apparent Off Mode”.
2)	Performance Specs.	“ Standby Mode ” limit of ≤ 0.5 W for Notebook PCs is too low. We support a limit of 2.0 W for both Desktop PCs and Notebook PCs consistent with the US Executive Order 13221 FEMP recommended Standby power limit. Our support of the 2.0 W FEMP recommended Standby power limit is based on the assumption that it is acceptable to disable Wake on LAN (WOL) network interface controller (NIC) functionality that many commercial PC customers require when the PC or Workstation is shut off (in an “Apparent Off” or “Standby” mode).
2)	Sleep mode	For Sleep mode limits, we request that a separate series of ENERGY STAR Low Power Sleep model limits be specified for Workstations tied to the Power Supply Rating (similar to existing Ver. 3.0 MOU).
2)	Performance Specs.	Idle (On) Mode spec. limits <u>should not</u> be included as there is no common agreement within industry related to test methods / standardized hardware and software configurations and we would never support testing and reporting to the SKU level. The comment “Research shows that typical office computers sit idle anywhere from 90 – 98% of their operating hours.” is not accurate and not adequate justification for imposing Idle Mode spec. limits. Idle Mode limits as proposed are too restrictive in any case.
2)	Performance Specs.	We do not support the proposed Active Mode spec. limits for internal and external power supplies as proposed limits are not attainable without adding substantial cost.
5)	Program Changes to Partnership Agreement	HP would prefer that use of the ENERGY STAR label remain voluntary, as opposed to product labeling being made a mandatory requirement.
6) b.	Performance Benchmark Approach	Does this proposed test methodology assume that performance applies to CPU performance? What about I/O performance? Need better definition of this proposal.