

Comment from METI on
2nd Draft - ENERGY STAR® Computer Specification (Version 5.0)

TEC Evaluation Categories for Desktops and Notebooks (Page 10)

- To be evaluated under TEC approach, Desktops and Notebooks will be classified into certain categories (Category A, B, C for Desktops and Category A, B for Notebooks) based on parameters. The classification system is renewed from those for idle power in the current standard version 4.0. Please provide rationale or analysis used to delineate these new categories.

Variables of TEC formulas (Page 11-12)

- TEC formulas for Desktops/Notebooks and Workstations contain various variables, some of which (e.g. $E_{padding}$) may be unfamiliar. Although units to be used for each variable group (i.e. Px, Tx and Ex) are already included in the specification, it may be more useful to add brief explanation of each variable just for clarification.

Capability Adjustment (Page 11)

- Please include explanation how to apply “Capability Adjustment” factors (see Table 1) to the calculation in the TEC approach. It may be useful to include a sample calculation for clarification.

Operational Mode Weightings (Page 11)

- According to the note on page 11, these weightings are based on the study by LBNL. These values must be reflecting the computer usages, which were obtained from the study. In general, the usage would vary depending on the user attributions (residential/office, environment, computer setup, etc.). These factors will influence E_{annual} and the qualification of products in the TEC evaluation consequently. Thus, further details and results of the study as well as the rationale for setting these weightings may need to be circulated and shared for review by stakeholders.

Typo in Table 8 (Page 17)

- In the shipment requirement for sleep mode, the desired ≤ 5 second latency is described to be listed in “definition M”. However, it must be a typo and should be “definition N”.

WOL Requirement (Page 17~18)

- Under Network Requirement in Table 8, computers are allowed to be shipped through enterprise channels without WOL enabled. However, the sentence on line 643-645 is requiring

computers sold through enterprise channels to be tested, qualified and shipped with WOL enabled. They are contradicting, and the latter sentence needs to be corrected in line with Table 8 Network Requirement.

Schedule/Comment Response Period (General)

- We understand that EPA's intention to finalize the specification by the end of October to have it effective in July 2009; however, enough comment period (i.e. from the draft distribution to the comment due date) should be given for all stakeholders. Compared with other specification development process, the comment period of Computer specification development is much shorter, and currently it is about 1 to 2 weeks. If EPA is seeking to receive thoroughly reviewed and productive comments from stakeholders, the current time frame would not be sufficient; thus, appropriate duration (e.g. 3 weeks) should be scheduled even at the stage of Final Draft.