

September 26, 2008

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FROM: Sun Microsystems, Inc.  
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Re: Comments by Sun Microsystems, Inc. on Draft 2 Version 5.0 Energy Star Computer Specification

Dear Katharine and Evan:

Thank you for the opportunity to provide comments on the EPA's Draft 2 Version 5.0 Energy Star computer specification. The comments that follow only concern the provisions impacting thin clients.

**Scope.** We would like to commend you for maintaining the position that thin clients shall be evaluated as clients independent of back end resources. We agree with this approach, as it is the one most likely to encourage and recognize energy savings at the client level.

**Processor Technology Tiers (Note at lines 619-623).** Sun opposes any future attempt to fragment the Thin Client requirements into "processor technology" specific tiers or "processor speed" specific tiers. Such artificial tiering would confuse the market, and undermine the E-STAR goal of encouraging power efficient technology by rewarding some products with E-STAR certification even though they were significantly less efficient than other products which serve the same purpose. Nor would Sun support any tiering which, in combination with the EU's 25% target, would have the unfair and unintentional effect of penalizing Sun for employing the most energy efficient system architecture.

**Wake on LAN (Table 8).** As recently discussed, in the Note to Table 8, we worry that the wording "Thin Clients that do not support remote software upgrade functionality..." could be subject to differing interpretations, and could still lead to confusion on whether or not a particular Thin Client product is exempt from the WOL requirement since it is likely that **\*ANY\*** product would have some sort of networked-based software upgrade functionality.

Since the intent is to exempt products that do not specifically benefit from WOL as part of their upgrade framework, Sun recommends wording more along the lines of, "Thin Clients products whose standard framework for upgrading client software does not require, nor benefit from, off-hours scheduling, and therefore do not benefit from WOL, are exempt from the requirement."

Continuing this point, Sun recommends the following additional clarifying changes, Table 8, Network Requirement for Power Management, Wake on LAN. Both references to “thin clients” should be clarified by amending the parenthetical from “(only applies to supporting centrally managed network software updates),” to instead read, “(products whose standard framework for upgrading client software does not require, nor benefit from, off-hours scheduling, and therefore do not benefit from WOL, are exempt from the requirement )”

Table 8, Network Requirement for Power Management, Wake Management. The reference to Thin Clients should be amended by adding the parenthetical, “(items whose standard framework for upgrading client software does not require, nor benefit from, off-hours scheduling, and therefore do not benefit from WOL, are exempt from the requirement )”

Table 7, WOL on LAN. The parenthetical under the capability header should be clarified by saying: “(Only applies if SW updates from the centrally managed network are conducted while the unit is in sleep or off mode. Thin Clients whose standard framework for upgrading client software does not require, nor benefit from, off-hours scheduling, and therefore do not benefit from WOL, are exempt from the requirement. )”