Thanks for the new draft Energy Star Specification. We'd like written comments about it as below:

a. Partner Commitments:
* Provide clear and consistent labeling of Energy Star qualified computer monitor. The Energy Star label must be clearly display on the top/front of the product, on the product packaging, in the product literature, and on the manufacturer’s Internet site where information about Energy Star qualified models is displayed:

  Comments: Please don’t add extra burden and cost to the manufacturer and product, to put the Energy Star logo on the product top/front and on web site is really make us so inconvenient cost up. Please think about to revise as follows:
  Provide clear labeling of Energy Star qualified computer monitor. The Energy Star label must be clearly display on the product, on the product packaging and in the product literature.

  * Provide to EPA, on an annual basis, unit shipment data or other market indicators to assist in determining the market penetration of Energy Star. Specially, partner must submit the total number of Energy Star qualified computer monitors shipped (in units by model) or ……

  Comment: It’s hard to collect correct data and will be a burden of the manufacturer and extra cost will be added for data collection. Most of our OEM client don’t accept us to expose theirs shipped data. Base on the reason above please delete this item.

b. Draft 1 Eligibility Criteria (Version 4.0)
3) A. On Mode/Active Power:
   - 640*480: < 37W
   - 800*600: < 40W
   - 1024*768: < 46W
   - 1280*1024: < 57W
   - 1600*1200: < 69W
   - 1800*1440: < 82W
   - 2048*1536: < 93W

  Comment: most of CRT will be fail but LCD OK. If the CRT monitor cannot meet the specification then manufacturer will no longer act effort to reduce power consumption and CRT monitor will consume much more energy. Please divide it into two parts one for CRT and another one for LCD monitor.

3) B. Sleep and Off Mode:
   Comment: please harmonize with FEMP about the OFF mode

3) D. Contrast Ratio: 200:1
Comments: most of CRT will be fail. Please divide it into two parts one for CRT and another one for LCD monitor.

3) F. Warranty: > 2 years
   Comments: most of CRT and LCD warranty is 1 year for global market. Please think about to change it to at least 1 year.

4) Power Measurement: report mean value of 5 units' measurement
   Comment: in order to meet the time to market that the test report and submittal must be done prior to mass production therefore it’s hard to have so many units ready for testing in design stage. Moreover, to assure the product comply with EPA Energy Star requirement and test on line for mass production is the obligation of the manufacturer. All of units in manufacturer site must be checked or tested to comply with EPA energy star requirement. Therefore it’s unnecessary to specify test units for testing to report to EPA.

5) Effective date: 1/1/2003
   Comments: The change of the new specification is huge and maybe most of old models which EPA list is no more qualified, manufacture need much more time to delete the EPA energy star logo from old models and new design for new/old models. Please delay the effective time to have at least 6 months slack time (after specification finalized) for product re-design and product phase-in.

If any further question or comment please contact me.

Ray Huang
Products Regulatory Lab.
Benq Corporation  (formerly: Acer Communications & Multimedia Inc.)