

Comments/Suggestions for Energy Star Labeling

COMMENTS ON POTENTIAL LABELING IDEAS:

1. Build the ENERGY STAR label into the product design as outlined in the Partnership Agreement.

Comments: We cannot comment because it is unclear what is outlined in the partnership agreement.

2. Use temporary ENERGY STAR labels on the top/front of the product that can be removed by the consumer.

Comments: At first glance this seems like a simple solution, but a temporary Energy Star label will create additional cost. The cost associated with temporary Energy Star labels (such as a sticker) are: the cost of the label itself, the factory cost of applying the sticker (throughput and cycle time), and the cost associated with testing to ensure the label adheres to the system during shipment.

3. Provide the ENERGY STAR label on the monitor base or stand. While not as visible as including the label on or around the monitor screen, it is being considered by EPA.

Comments: See comments from proposal 2.

4. Develop an ENERGY STAR folder similar to the Control Panel folder. Drive the consumer to the folder through compelling information in the user/instruction manual. (Note: A manufacturer proposed this option; the only downside is that it may not be feasible if the manufacturer sells the monitor separately from the computer.)

Comments: The feasibility of this proposal sounds very difficult. We feel the cost associated with this proposal far outweighs the benefits. There is cost associated with developing the software for the control panel folder (keep in mind this will be different for each type of OS). In addition, there are costs (implementation, throughput, and cycle time) associated with the factory-install of the folder and the system qualification to ensure the folder is installed properly.

We also feel that from a usability standpoint, providing an Energy Star control panel folder will confuse the user. The user may not be sure what the folder is and whether they can remove it from their system (because it takes up space on their hard drive). In all likelihood, this can be a generator for customer support calls (added complexity to the system), thus adding cost. Furthermore, this could have a negative effect on the customer's experience with the product.

To confirm your statement regarding the downside of this proposal, many computer systems are sold without a monitor or visa versa. For example, a company may want to upgrade just the system or upgrade from CRTs to FPDs.

5. Design a removable label for the power cord, similar to safety labels on some consumer products. While the label is not on the front of the product, ENERGY STAR finds this idea acceptable as it may help the consumer to make the connection between energy use and air pollution. It is limited to products that have non-detachable power cords.

Comments: Some monitors and most systems have a detachable power cord; therefore, this labeling technique would not be feasible for them. Also, please see comments from proposal 2.

6. Provide the label in an on-screen display. (Note: This idea came from a manufacturer during the EPA/Industry meeting. While interesting, additional details are required to fully evaluate its feasibility and usefulness.)

Comments: Some monitors do not use an on-screen display (OSD); therefore, this labeling technique may not be feasible for every monitor. We feel this proposal will also cause confusion to an already confusing process of making screen/display adjustments. If the Energy Star label in the OSD, a user may associate the OSD adjustment with the ability to manage how the monitor consumes power. When they do not get the desired power management, they will most likely call technical support, thus adding to the cost. In addition, there is the cost of developing this proposal.

7. Incorporate the ENERGY STAR label into the boot up process. The label may appear during the initial boot up or all boot ups. (Note: Again, this option is limited if the manufacturer sells the monitor separately from the computer. Another concern may be the ENERGY STAR status of the computer.)

Comments: The feasibility of this proposal sounds very difficult. There is BIOS complexity associated with incorporating the Energy Star label. In addition, this proposal would conflict with quick boot goals, and possibly cause issues with boot time requirements dictated by Microsoft (further investigation is needed).

In the past, we have received customer complaints regarding the length of time it takes for the boot up process. If we were required to add an additional screen in the boot up process and allow sufficient time for the user to read the screen, we feel this would generate customer dissatisfaction with the product (monitor or system). In all likelihood, this can be a generator for customer support calls (the user thinks the system has "hung" or it is simply taking too long), thus adding cost. We do not feel this proposal will have a positive effect on the customer's experience with the product.

To confirm your statement regarding the downside of this proposal, many computer systems are sold without a monitor or visa versa. For example, a company may want to upgrade just the system or upgrade from CRTs to FPDs.

8. Include the label and a brief mention of ENERGY STAR on a promotional piece provided in the shipping box.

Comments: The feasibility of this proposal is attainable. However, we would advise against it. Set up is probably the most difficult part of owning a computer. Adding additional documentation will only increase this difficulty. Our company receives a good

majority of its support calls during set up; therefore we are trying to only provide what the user will need for the set up process. Furthermore, in usability studies we have found that the majority of users do not look at the documentation, but revert to the user's manual.

In addition, if we ship Energy Star complaint monitors or systems into other countries, there will be a cost associated with translating the promotional piece.

9. Display the ENERGY STAR label on any plastic protective coverings for the monitor.

Comments: The feasibility of this proposal is attainable. We would like to point out that some monitors do not have any protective coverings. We would like to suggest that this proposal exist for those products that have protective covering (do not require for all monitors).

10. Provide the ENERGY STAR label on any accessories, such as a mouse pad, shipped with the monitor.

Comments: The feasibility of this proposal is attainable. However, with the industry moving towards optical mice, then need for mouse pads are not as prevalent as it was a few years ago. In addition, the cost would be similar to those discussed in proposal 2 (see proposal 2 for details).

11. Develop an ENERGY STAR point-of-purchase promotional item, such as a shelf talker, and work with retail staff to place it in retail stores along with qualifying monitor models. Please note that EPA believes adding the label to the back plate is insufficient, as it does not increase the visibility of ENERGY STAR.

Comments: We do not have comments regarding this proposal because we do not use retail channels.

ADDITIONAL IDEAS:

We support the promotion of the ENERGY STAR. We believe you will get the most industry participation by implementing a labeling program that is zero cost, zero impact, and allows for flexibility. We feel that the most consistent way across industry is to allow industry to promote the ENERGY STAR logo through packaging (on the exterior of the box) and through product document (owner's manual/ user's guide). Furthermore, if you allow industry to have flexibility in choosing from several labeling techniques, you will also get more industry participation. We suggest ENERGY STAR allow industry to choose from three to four techniques and allow industry to choose which one will best fit the product.