

Transource Computers Comments

The EPA's proposal to raise the power supply criteria from 80+ Bronze to Silver for products under 500W presents significant challenges for small manufacturers like ourselves.

We support EPA's mission in energy efficiency and protection of the environment. Still, we believe the goal is accomplished by the advancements in energy-saving technologies in other critical components like motherboards, CPUs, and SSDs. These advancements significantly reduce overall energy consumption, effectively compensating for the difference between the Silver and Bronze power supply levels.

If the change is to occur, it will be incredibly daunting for small businesses in the manufacturing sector, especially those producing entry-level computers with power supplies of 500W and below. We operate with limited resources and face higher relative research, development, and compliance costs. Upgrading products to meet the new 80+ silver Criteria requires additional investment in technology, testing, and certification processes. The financial and operational impacts are substantial, potentially threatening our viability in a competitive market.

Moreover, we would like to ask the EPA to consider the current administration's goal of bolstering the domestic manufacturing base. The entry-level computer market, crucial for small manufacturers, is disproportionately impacted by these changes. The added costs and complexities could hamper our competitiveness and sustainability in the market.

Therefore, we strongly encourage the EPA to adopt a more comprehensive approach to evaluating the energy efficiency of devices with power supplies of 500W and below. We propose that the current criteria for these devices be maintained at the 80plus Bronze level rather than transitioning to the Silver level. This approach recognizes the cumulative impact of energy efficiency improvements across various components and supports the sustainability of small manufacturers who play a vital role in the industry.

-Anna Ting