

Draft 1 V1.0 LNE Specification:

Line 186: Recommend clarity on the difference between optical and physical ports as it pertains to pluggable modules (i.e. SFP, QSFP, etc). Would an SFP port with an optical SFP module be in scope or would only an SFP port with a Twinax cable be in scope?

Additionally we don't understand why the DOE/EPA is excluding optical ports, particularly as for LNE a majority of networking connections are going optical and the newer highest-throughput ports are only optical. The wording included in Draft 1 of the measurement method (i.e. that ports that supported either optical or Cu be tested with Cu connections, ports only optical tested with optical) appeared to be a better middle-ground position than this current proposed exclusion of optical ports. Additionally, if the EPA does continue to exclude the optical ports, this will likely preclude many LNE products (for example those that have optical-only uplink ports) from being able to obtain an EStar rating or be compared as their apparent watts-per-capacity will be skewed by the exclusion of its optical capacity.

Line 298 - no statement appears to be made as to whether the power factor per load % is required to be met over the entire rated PSU input voltage and frequency range, or simply under the "relevant input voltage/frequency combination for each market in which the product will be sold and promoted as ENERGY STAR" (i.e. those listed in Section 4A of the LNE Draft 2 Test Method document). Also suggest the EPA clarify on Line 293 and in line 298 that these are "Power Factor Requirements for AC-input PSUs".

Line 305: "Port Power Down: An LNE product must have the ability to power down unused physical network ports in an automated fashion, which does not require input from the end-user." - would unused mean unconnected and/or a port with no link or activity?

Also suggest clarification from DOE/EPA if the intent in including this power down requirement is as an addition to the requirements of EEE or was it the intent of the EPA to simply highlight this portion of the EEE requirements. Further, if the intent is as an additional requirement, what constitutes "powering down", a 10% power reduction, 90% reduction, or do they mean 100% power off -- and how measured?

Draft 2 V1.0 LNE Test Method:

line 66: suggest that the EPA consider allowing "simulated 27C" operation such as is allowed in other standards (like Acoustic) so as to not require a thermal chamber while performing these measurements.

line 109: Discussion on "snaked traffic" -

Would suggest the DOE/EPA reconsider and allow use of snaked for products where the difference between snaked and this method would result in <10% power consumption difference. Otherwise, the insanely expensive amount of test gear required for large LNE per the current draft written requirements will likely preclude interest in obtaining an EStar rating.

line 157: PDU discussion:

if a manufacturer wants to test through a PDU for ease of test gear requirements and that causes a few watts of power hit but the results still look good, then the manufacturer should be allowed to do so. For LNE drawing many 100's of watts a couple of watts lost in a PDU (if even that) will be "in the noise".

line 262 I don't understand how a data port could be an "either pluggable module or non-pluggable interface"? Seems like once something is non-pluggable, it is non-pluggable and therefore can't be a pluggable....

Line 366 - editing error where this line has the text "Thirty Percent" when the text should say "Ten Percent" as consistent with line 365 and the rest of line 366.