Hi John and Ryan,

Thank you for the opportunity to provide feedback to the LNE V1.1 Draft.

Cisco supports the proposal of removing the physical network port count limit of 40 Gb/s+ port.

Please note the test protocol referenced in Section 3.2.2 and Section 3.2.3 are inconsistent. Generalized Internal Power Supply Efficiency Test Protocol, Rev. 6.7 is referenced in Section 3.2.2 while Rev. 6.6 is referenced in Section 3.2.3. Perhaps this discrepancy is just a typo error where it will be corrected in the final document.

Cisco also encourages EPA Energy Star to adopt 80 Plus Gold standard as criteria both for minimum energy efficiency targets as well as for power factor criteria and to eliminate Section 3.2.2 and Section 3.2.3 for the sake of avoiding confusion.

Also, Cisco would like to express our concern about the fundamental flaw in the Generalized Internal Power Supply Efficiency Test Protocol. This protocol assumes the efficiency of a fanless power supply is comparable to a power supply with an integrated fan tested with the fan disabled, or using external power source for the fan load. It also allows a fanless power supply to use an external fan to avoid thermal cut off. In reality, power supply with an integrated fan cannot always been tested according to the protocol. Also, using an external cooling source to avoid thermal cut off during testing has already broken the rule of measuring efficiency in a self-contained system. Due to the diversity of the power design approach, it is not an easy task to come up with a more meaningful metric at this time.

Best regards,
Daisy