

Topic	Subtopic	Comment Summary	EPA Response
Certification Criteria	Discrete Graphics Allowance	One stakeholder recommended that EPA align the discrete graphics allowance with the CEC Title 20 Tier II level so as to specify requirements more stringent than the CEC mandatory standards.	EPA provides adders when a feature or function that is sought after requires additional energy. Providing such adders follows EPA's principle that ENERGY STAR means savings without sacrifice. According to EPA's dataset, setting the ENERGY STAR adders at the levels proposed in Draft 2 are required to ensure that products with discrete graphics are able to earn the ENERGY STAR.
Certification Criteria	Mode Weightings	One stakeholder expressed doubt that the time spent in sleep mode has increased as much as indicated by EPA data, pointing to a study performed by the California Plug Load Research Center to be published shortly. The stakeholder indicated that sleep blockers may reduce time in sleep mode and requested that EPA provide the design parameters of the study used to determine mode weightings.	EPA believes the size and veracity of the data set used to inform the mode weightings proposed in Draft 1 accurately summarizes the U.S. market at this time. The data set is made up of over 1 million active continually tracked desktop, notebook, and workstation products used both in the U.S. and globally. While EPA is making use of this data set, the Agency is interested in the CA Plug Load Research Center study, and will review it when it becomes available to determine any future considerations for ENERGY STAR.
General	Requirements and Recertification of Notebooks	<p>Industry partners requested clarification as to whether notebooks certified to Version 7.1 would have to recertify to Version 8.0, specifically regarding testing of systems exhibiting cyclical behavior. They requested that systems exhibiting cyclical behavior and certified to Version 7.1 be allowed to recertify without retesting.</p> <p>Industry partners further proposed that, if notebooks would be required to recertify to Version 8.0, EPA consider revising the notebook base TEC requirements based on the new mode weightings.</p>	After additional discussion with stakeholders following the Draft 1 specification, EPA learned that the scope of the products requiring retest is so small that retesting will not introduce notable additional testing burden. As such, those products exhibiting cyclical behavior which have not been tested per the new test method, introduced in V7.1, will need to be retested.