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Subject: comments on the EnergyStar proposed baselines

In Section 3B2 it looks like you are stating a requirement that we have the functionality for “Automatic determination of occupants’ presence in the home (e.g., through direct sensing of motion, or indirectly via geolocation devices such as smart phones)”. We are a bit surprised to see this requirement as I do not think it has been discussed previously. In our opinion a service should be evaluated based on the amount of energy it can save. If the algorithms that it uses to achieve these savings can pass the required threshold without geolocation or motion sensors then we think that should be sufficient.