

IBM Comments: ENERGY STAR® Program Requirements for Computer Servers V1.1
Partner Commitments

IBM appreciates the opportunity to comment on the V1.1 revisions to the Computer Server Requirements and Partner Commitment. These comments cover the changes to the partner commitments (pages 1-3 of the Computer Server Requirements V1.1). IBM intends to submit comments on the changes to the V1.1 technical specifications by the 10/15/2010 due date. Overall, IBM does not have significant concerns with the proposed changes to the partner commitments. IBM did participate in the development of and supports the content of the comments submitted by ITI with regards to the computer server requirements. IBM offers the following specific comments to the draft document:

Section 2: Adjust the language of this item to read as follows: “Obtain certification of a **product** ENERGY STAR qualification from a ...” This more clearly states the requirement.

Section 2: Include language which clarifies that the submission to a certification body will be required beginning January 1, 2011 or when a minimum of 10 certification bodies have been registered by USEPA. IBM is requesting that a minimum number of certification bodies be available to insure a sufficient pool of capabilities is available so that companies can bid the certification process to ensure a fair cost.

Item 7: IBM is supportive of the need to perform product verification testing, but is concerned that the partner agreement does not set limits on the number of products that can be subjected to verification testing. While the certification body requirements specify that at least 10% of qualified products should be subject to verification testing, IBM believes it would be appropriate to a similar 10% limit within the partner agreement unless extenuating circumstances require greater verification testing activity.

Section 9.2: A partner should be required to report by qualified product or product family. This is how the company qualified the products, they are segregated along this criterion in company reporting systems, and there should not be a need for EPA to further segment the reporting requirements beyond the company’s qualified products and product families.

Section on “Performance for Distinction”: EPA should remove the reference to the Climate Leaders program, as EPA recently announced that the Climate Leaders program will be sunset.