Comments on ENERGY STAR Eligibility Criteria and Test Methods for Computer Servers Draft V1.1 and Displays V5.1

October 15, 2010

ITI understands the purpose of the ENERGY STAR Computer Server Draft Version 1.1 and Displays Draft Version 5.1 is to resolve or clarify components of the specification for certification and accreditation bodies, but would like to ask for clarification and/or changes in a few areas. ITI and its members actively support the efforts of the ENERGY STAR program in promoting energy efficiency and maintaining the program's integrity.

Comments on Computer Server V1.1

- On line product submission tool: the current excel spreadsheet template has been prone to
 data entry errors. In an industry meeting with the ENERGY STAR program, we offered to
 update an unlocked version of the template for ENERGY STAR for future data submissions.
 Our interest is to minimize the data entry and cycle times in the approval process.
- Power Supply Criteria: two exceptions were not carried over from version 1. Since the 1.1 version was not intended to change criteria or scope, and implementation will occur upon release, industry recommends restoring 1) the additional 4% tolerance given to power supplies greater than 1.5kW, and 2) exemption for power supplies equal to or less than 75W.
- Product family description: the proposed product family options should also allow for
 variance in the CPU core count, CPU socket power (TDP), and/or the number of populated
 CPU sockets within the family. The current definition requires multiple test points and
 submittals within a manufacturer's product line, limiting any benefits to qualifying product
 families. A less restrictive product family boundaries use coupled with a requirement that
 the manufacturers identify the envelope of components and configuration options
 represented by their product family qualification data is recommended.
- Industry believes that the reference http://eetd.LBL.gov/Controls is not appropriate for servers. We suggest the reference be modified and clarified to avoid confusion or interpretation as a requirement to comply. The reference is specific to client based, single user devices. Computer servers as multiuser systems networked to service the data demands of a data center.

Comments on Displays V5.1

• Page 4 Tier 2 requirements: Is there target Tier 2 P_{max} that ENERGY STAR wishes to achieve, for example x% lower than current ENERGY STAR V5.0 P_{max} ? Is there an anticipated date for concluding the TBD values? What implementation period is planned for phase in Tier 2 implementation?