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SMART Technologies ENERGY STAR for Displays 8.0 Draft 2 Comments

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Introduction

SMART greatly appreciates the integration of our earlier comments into ENERGY STAR for Displays 8.0 Draft 2. We especially commend the adjustment of the P_{ON} curve. This is a much better reflection of what is technically achievable today.

There are still two closely-related critical shortcomings in Draft 2. They are the “Key Comments” below. SMART would be happy to discuss these further with the Draft 3 authors.

Key Comments

Categorizing Signage Displays

SMART applauds the addition of the categories “Signage Displays and Monitors with Plug-in Modules” and “Signage Displays and Monitors with Embedded Modules”. However, Draft 2 does not properly capture evolving signage display computation capabilities.

1. Recently introduced plug-in modules don’t qualify as such under Draft 2 because they include compute cards which provide a full general computing function.
2. By its nature, a plug-in module can come from a third party and therefore its capabilities cannot be known. It would be anomalous to test a display based on the module shipped with (but not integrated into) it if the exact same display could be tested with a plug-in module inserted or removed depending on the characteristics of a third-party product. Only the signage display is certified under ENERGY STAR for Displays, not the plug-in module.
3. Foreseeable embedded modules will also support full general computing.

The EPA correctly recognizes that an 86” signage display with computation is still not just a very large all-in-one desktop computer and does not belong under ENERGY STAR for Computers. The question is where such a device belongs. However, this is not a fundamental problem. Signage displays are at heart signage displays, not computers. The products are used in fundamentally different ways.

There is no reason to keep computation out of the signage display (but not monitor) part of ENERGY STAR for Displays. This is where the technology is heading. Computation capability should simply be properly recognized and accounted for.

The solution is to extend the scope of plug-in module and embedded module to include support for general computation. If the display is otherwise in scope under 1(A)(1)(b), it should remain in scope.

Recommended Changes

In both Section 1(E)(5) and Section 1(E)(6) (lines 134 and 144):

1. Delete “without the explicit purpose of providing general computing function”.
2. Add after b) (lines 138 and 148), “c) Provide a general computing function.”

Computation Allowance

The new categories recognizing computation are an excellent start, but they will only be useful if there is some allowance for that computation.

Recommended Changes

For both plug-in modules and embedded modules, add an allowance for compute power. This should draw from ENERGY STAR for Computers and could even reference that specification directly.

Additional Comments

The remaining comments are minor.

Typo

On line 37, change “the listed criterion” to “the listed criteria”.

Usage Environments

On lines 135 and 144, change “home and office” to “school and office”. Plug-in and embedded modules are only used in signage displays, not monitors, and signage displays are used in schools but not in homes.