

Summary of Key Product-Specific Comments and Changes

Comments Relevant to Multiple Product Categories

- *Annual reporting of unit shipment data:* EPA received multiple comments regarding the confidentiality of shipment data. EPA clarified that data can be submitted to third party organizations that aggregate the data before sending it to EPA. Stakeholders commented that the provision for segmentation of unit shipment data represented an additional burden for manufacturers. This requirement does not deviate from how data is collected in the current versions of the program. For example, categorization of shipments by subtype is already common (e.g., computer shipments broken into desktop computer shipments, notebook computer shipments, workstation shipments, etc.). EPA has maintained the language presented in the initial draft. EPA will in early 2011, ask partners to submit unit shipment data for all product categories in which they qualify products as ENERGY STAR.
- *Tolerances:* Stakeholders requested that EPA make use of tolerances similar to those used by DOE for the minimum efficiency standards program. EPA does not allow for tolerances regarding ENERGY STAR qualification and believes that manufacturers are in the best position to account for manufacturing variation when applying the test standards referenced in the ENERGY STAR product specifications.

Appliances and Water Heaters

- *Alignment with DOE standards:* Stakeholders recommended that EPA use the same product definitions, product family approach, and rounding guidance required by DOE in the relevant sections of 10 CFR 430. The Final ENERGY STAR specifications for residential dishwashers, clothes washers, room air conditioners, and residential refrigerators and freezers are now harmonized with current DOE standards (i.e., 10 CFR 430). It is EPA's understanding that efforts are underway by DOE to clarify the basic model definition and structure. If changes are made to DOE standards, EPA will work with stakeholders to incorporate these changes into the relevant ENERGY STAR specifications.

Lighting

- On July 20, 2010, EPA issued changes to product disqualification procedures for lighting products (SSL, CFL, and ILL). EPA has now modified existing lighting product specifications to reflect the changes identified in the July 20, 2010 letter.

Consumer Electronics and IT Equipment

- *Technical comments:* EPA received a wide range of specific technical comments on proposed revisions to CE/IT product Eligibility Criteria and Test Methods. In nearly all instances where partners raised concern regarding the proposed edit's impact on clarity or a product's ability to qualify as ENERGY STAR, EPA reverted to current specification language (example: the computer specification listing of product categories has returned to the format and content in Version 5.0). EPA has maintained a record of comments received during this effort and will bring proposed changes into the next full specification revision process for each product.
- *Labeling language:* To minimize disruption to existing labeling practices for qualified products, EPA has ensured that all requirements for use of the ENERGY STAR certification mark for individual products (e.g., on product packaging, in marketing collateral) are consistent with existing provisions in the program.
- *Test Methods:* EPA has made the following updates to the standard format for test methods.

- In response to a number of stakeholder comments regarding the Power Meter attributes, EPA has returned language describing power meter attributes to that of specifications currently in effect. EPA maintains the intention to pursue better consistency in descriptions of power meter attributes across the program and will introduce this topic as a point for discussion in the full revision processes for each ENERGY STAR product category.
- The Testing Voltage table now includes only references for ENERGY STAR partner countries.
- *Internal power supply documentation:* Stakeholders suggested that EPA accept certificates of compliance from an EPA recognized power supply testing facility in lieu of laboratory testing conducted during the product certification process. EPA supports this proposal. References to the internal power supply test method in the specifications have been removed accordingly.
- *Training and consumer education requirements:* EPA has revised partner commitments to align the user education requirements with those in the specification currently in effect. If no requirements were present, this section has been removed.
- *Product families:* EPA received mixed responses to the proposals put in place for product families; certain products received little comment while others received significant opposition to EPA's proposal. EPA has returned to existing guidelines on definition of product families found in currently effective specifications. Specific comments related to computers and servers are below:
 - In response to the proposed family requirements for computers, stakeholders suggested that manufacturers be allowed to define what constitutes a product "family," suggesting that it is not possible to develop a standardized definition for product families that will fit every manufacturer's products and that will remain current for any appreciable period of time. EPA has revised provisions accordingly, which is consistent with the current version of the program.
 - In response to family requirements for servers, two stakeholders expressed concern that EPA had not made modifications to the existing Version 1.0 family structure to ease qualification of product families. EPA is in the process of working with stakeholders to address family provisions in the Version 2.0 Server specification. EPA strongly supports stakeholder efforts to research this topic. The changes reflected in the V1.1 draft and final specifications were intentionally narrow, leaving matters that impact which product will qualify as ENERGY STAR for the currently underway full specification revision process.
- *Number of units required for testing:* EPA received numerous comments regarding the proposal to require testing of two additional units in cases where the first unit was within 10% of the ENERGY STAR requirement. After careful consideration, EPA has returned to unit testing requirements found in currently effective specifications. For specifications without additional unit testing requirements, no provision has been included in the final guidelines. Ultimately, EPA does intend to further investigate unit-to-unit variability, incorporating requirements during specification revisions as appropriate to the product.

Televisions

- *Power overhang:* EPA received conflicting proposals and comments in response to the power overhang topic in the Version 4.2 draft for televisions. In response, EPA has removed power overhang from the final draft but rather will work with stakeholders in the coming months to define time limits and testing methodology for power overhang.

Computers

- *Full network connectivity*: EPA has retained the full network connectivity (“proxying”) requirements in the Version 5.2 specification for computers. EPA received concerns regarding the proposed TEC weightings for notebook computers using proxying technology; in response, EPA will revisit the weightings for notebooks as part of the next specification revision, Version 6.0, which is set to commence shortly.
- *Long/short idle*: EPA received industry proposals to incorporate the concepts of Long and Short Idle State into the Version 5.2 document. While EPA generally supports efforts to align with the Ecma-383 standard in this and other areas, it was not the intent of Version 5.2 specification to include revisions to the existing structure of the program. As such, EPA maintained the existing language and structure for Idle State and plans to work with stakeholders through the full specification revision process to pursue alignment with Ecma-383.