



January 9, 2013

Mr. Robert Meyers
Product Manager, ENERGY STAR Computers
U.S. Environmental Protection Agency

JEITA's Comments on Energy Star Computers Ver 6.0 Draft 3

Dear Mr. Robert Meyers,

The Japan Electronics and Information Technology Industries Association (JEITA) appreciates the opportunity to provide comments on the ENERGY STAR Computers Draft 3 Version 6.0 released by the U.S. Environmental Production Agency.

JEITA is the largest electronics trade association with more than 400 companies in Japan covering consumer electronics, industrial electronics, semiconductor, and other electronic components. We welcome the EPA's proactive efforts to improve the ENERGY STAR program.

In this document, we would like to submit our views on the Computer Version 6.0 Draft 3 specification as follows:

[Eligibility Criteria Draft3 Version6.0]

Line 356 Table3:

We agree with the ITI category proposal for desktops.

In the case of Ecma Categories for desktops, please clarify how to handle desktop computers that do not fall in any category. For example, what about products with 2 channels of memory and 1GB base memory?

Line358 Table4:

The Performance Score used for the Notebook categorization is expressed in the following formula: $P = [\# \text{ of CPU cores}] * [\text{CPU clock speed (GHz)}]$.

Therefore, the definitions of the “CPU core” and “clock speed” need to be clarified. More specifically, the “clock speed” should be a “base clock speed” and not a “turbo clock speed”, and the “core” should be a physical core.

Line435 Table5:

Is it a requirement to test an external power supply at a third-party testing lab?

Does it mean that a test by a testing lab will be a requirement to be able to use the Power Supply Efficiency Allowance?

When not using the Allowance, does it suffice to verify Efficiency Level V (i.e. the conventional approach)?

There are desktop PCs that use EPS. In the Table 5, the required efficiency values are the same for notebook and integrated desktop computers. Therefore, it is wrong to categorize the EPS allowance values by the computer type.

Line444 Table7:

The Mode Weightings values in the Full Network Connectivity columns of the table on Notebook computers should be revised.

The sleep-mode ratio of a Full Network Connectivity product tends to be higher than that of a Conventional product, and the idle-mode or off-mode ratio of a Full Network Connectivity product tends to be lower than that of a Conventional product (as in Table 6 for Desktop computers). However, in Table 7, the off-mode ratio of a Full Network Connectivity product is higher than that of a Conventional product, and the sleep-mode ratio is lower than that of a Conventional product.

Table 7: Mode Weightings for Notebook Computers

Mode Weighting	Conventional	Full Network Connectivity			
		Base Capability	Remote Wake	Service Discovery / Name Services	Full Capability
T _{OFF}	25%	34%	38%	46%	50%
T _{SLEEP}	35%	30%	28%	22%	20%
T _{LONG IDLE}	10%	8%	7%	6%	5%
T _{SHORT IDLE}	30%	28%	27%	26%	25%

UP?
DOWN?

Line450 Table10:

- We agree with the ITI category proposal for desktops. If the categorization that ITI has proposed is not adopted on Table3, Our concerns are as follows:
 - The Desktop GPU Adder is large.
If Category DT2 Base TEC + G5 Graphics adder = DT3 Base TEC value, the discrepancy is too large. Please check if this is correct.
 - Regarding DT3 G7 product graphics adder value, do you add the difference of G7 minus G5? Or do you add the G7 adder value? It needs to be clearly stated that, the value after subtracting the G5 value is added to obtain the TEC GRAPHICS value for DT3.
Example: In case of G7, $157\text{kWh} - 113\text{kWh} = 44\text{kWh}$
- The definitions of Graphics G6 and G7 are different from their definitions in ECMA383. Please check if this is correct.

Line654 6.1.1:

Effective Date is specified to be October 1, 2013.

If the production and shipment of a product starts in September 2013, is it allowed to obtain Energy Star V6 third-party certification for the product, attach the applicable label on it, and ship it in September 2013? If that is the case, does it mean that the product in question does not require Energy Star V5 certification?

[Draft 3 Test Method]

Line85:

The ENERGY STAR test image should be published by the time the final draft is out.

Sincerely,

Takayuki Kobayashi

Chairman, PC Energy Saving Working Group

Japan Electronics and Information Technology Industries Association (JEITA)