



Robert Meyers, Product Manager
ENERGY STAR for Computers
United States Environmental Protection Agency
Office of Air and Radiation
Washington DC, 20460

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Mr. Meyers,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to ENERGY STAR's proposed expansion of covered products to include slates and tablets in the Computers 6.1 specification. After a careful review of the proposed revisions, this letter is submitted on behalf of NEEP and the Cape Light Compact.

Generally, we are very supportive of expanding this category to the growing slate/tablet and two-in-one computer market. As analyzed in NEEP's 2013 Business and Consumer Electronics strategy report, the household penetration of tablets from Q1 2012 to Q1 2013 rose from 31% to 48% of US households. Additionally, tablets are forecasted to grow 27% in sales through 2016.¹ An increasing number of consumers are relying on tablets to access content rather than more traditional electronics such as televisions and computers; as such the focus on product level efficiency *now* is crucial to ensure the category grows with efficiency as a primary consideration.

Regarding the proposed definition for the Slate/Tablet category, we have several recommendations. We are reluctant to rely on setting a screen size limit to omit smartphones; while a size limit of 6.5 inches may be appropriate with products currently available, it could become quickly outdated as the tablet and phone markets are shifting rapidly and tablets have the potential to shrink in size, while smart phones have the potential to grow. It may be more clear and long-lasting to explicitly state within the definition of tablet/slate that the primary function of the device should not be for use as a phone. It may also be worthwhile to expand "Marketed as a Table/State computing device" to include "and not as a phone," as the marketing material for large smartphones may include tablet/slate language (i.e. "this phone has so much computing power, it doubles as a tablet!") and may enter ENERGY STAR into a grey area.

Another potentially confusing categorization is whether devices marketed as "phablets" may fit into this specification. While we do not have an opinion either way on the inclusion or exclusion of phablets, it may be worthwhile for this specification to acknowledge phablets (i.e. "at present, this specification does not apply to phablets devices in the market" or "devices marketed as phablets that meet all the listed criteria would be considered for ENERGY STAR designation").

Regarding the proposed test procedures, we feel it may be worthwhile to revisit the long and short idle mode testing; for many tablets, there is no difference between a short and a long idle mode with devices entering a long idle mode after a period of inactivity without dimming the screen first. With regard to the maximum power test, the language may need to be adjusted as most slates/tablets will be running applications rather than programs and may not be designed to run multiple applications at once (at least not at full power). We would recommend visiting the applications used for the maximum power test to ensure consistency amongst products.

¹ NEEP, [Business and Consumer Electronics: A Strategy for the Northeast](#), pp 29, 41. August 2013



Finally, there may be opportunities to set lower energy use thresholds for devices that have hardware not typically used in notebooks than the limits in the "0" category of table 6 in the Version 6.0 specification. At present, that threshold may be inclusive of most tablets on the market, and there may be an opportunity to set a lower threshold that would apply to the more efficient slates/tablets on the market.

Thank you again for offering this opportunity to provide comments on this proposed category expansion. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a stylized flourish at the end.

Claire Miziolek
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