

1 General Comments on ENERGY STAR Product Specification for Telephony Eligibility Criteria Draft 1 Version 3.0

Cisco agrees with EPA's approach of focusing on energy consumption in Partial On mode. Furthermore we agree that providing an Off Mode Incentive will be an extremely valuable tool for promoting energy savings, to the extent that partners are capable of implementing an Off Mode that complies with the Energy Star requirements. EPA seems to be of the same mind, as indicated by the Note in section 3.4.2, which reads "EPA would like to encourage the adoption of Off Mode by making activation easily accessible to end users (and operators where applicable) while providing manufacturers flexibility in product design and implementation." With this in mind, our comments are focused on refining the definition for Off Mode so that this mode will become widely adopted. Allowing Energy Star Partners flexibility in implementing off mode is the key to fostering its adoption.

2 Specific proposals/comments

2.1 Section 1.B.3

In Section 1.B.3, the definition for Off Mode currently reads as follows:

Off Mode: A mode that may persist for an indefinite time when a Telephone is connected to a power source and a telephone line or other physical or wireless network connection and is NOT capable of receiving a call absent external stimulus such as network initiation, physical interaction with the receiver or other part of the Telephone.

Our concern is that the phrase "absent external stimulus ..." could be interpreted as implying that the Telephone must respond to external stimulus in some particular manner while in the Off Mode. We believe that it should be up to individual Energy Star Partners to decide when and how their Telephone wakes up from Off Mode. As such we propose that the definition of Off Mode be simplified to read as follows:

Off Mode: A mode that may persist for an indefinite time when a Telephone is connected to a power source and a telephone line or other physical or wireless network connection and is NOT capable of receiving a call.

2.2 Within Note Block in section 3.3.4: Feedback on prevalence of Off Mode

Within Note block in section 3.3.4, EPA requests stakeholders to provide feedback on the prevalence of Off Mode mode in current and near term models. Many of Cisco's recently-released and future

Telephones contain/will contain Cisco EnergyWise Technology, which we believe meets EPA's requirements for Off Mode. Upon request, we can provide a pointer to the Cisco public web page that describes EnergyWise Technology and provides a list of VoIP Telephones that include EnergyWise Technology.

2.3 Within Note Block in section 3.3.4: Feedback on expected Power Level during Off Mode

Also within the Note block in section 3.3.4, EPA requests stakeholders to provide feedback on expected Power Levels during Off Mode. Cisco agrees with EPA's assertion that power levels of 0.5 - 1.0W ARE FEASIBLE for a VoIP Telephone in Off Mode, IF the Off Mode definition is clarified as suggested by our proposed clarification, and if Section 3.4.1 remains as currently worded.

2.4 Within Note Block in section 3.3.4: Feedback on query regarding ability to receive telephone calls while in Off Mode

Regarding the query at the end of the Note block in section 3.3.4 that asks "whether or not the Telephone would be capable of receiving calls at these low power levels and if so, what the market demands would be regarding wake time/latency.", inline with our previous comments we believe it is NOT feasible to expect that PoE-powered VoIP Telephones can be made capable of receiving calls at these low power levels (i.e. in the 0.5W-1.0W range). Again, this is why we believe the specification should be updated to unambiguously state that a Telephone in Off Mode should NOT be required to be capable of receiving an incoming call nor respond to external stimulus. Of course, each Energy Star Partner will devise some means of waking up the Telephone from Off Mode but we believe that any attempt to dictate the manner in which this must be accomplished could have the unintended consequence of discouraging vendors from supporting an Off Mode.

2.5 Section 3.4.1/Overall comments regarding Off Mode

With the exception of the comments above, Cisco believes that Off Mode is well specified within the document. Specifically, we are in agreement with the requirements in section 3.4.1 that require Telephones claiming the Off Mode incentive to provide two of the three described actions. We also support the incentive calculation formula in Equation 3, which provides an Off Mode Incentive proportional to the delta between Off Mode power consumption and Partial On Mode power consumption.