

1 General Comments on Version 3.0 Development

As part of the development of the Program Requirements for Telephony, version 3, it is important to recognize the growing market for video-capable telephony devices (i.e. devices capable of capturing/transmitting and receiving/displaying full-motion video content). This will require recognition of the product categories, as well as decisions regarding the inclusion or exclusion of these devices in the telephony program. The current program requirements and test method documents are ambiguous in their treatment of devices that include video function. In particular, defining a telephone as a "product whose primary purpose is to transmit and receive sound" is ambiguous and could be interpreted as either inclusive or exclusive of video-capable devices. It is important that the program requirements document (and in the interim, the test method) provides a clear position for all types of video telephony products.

It is understood that there is intent to exclude video phones from this revision of the program. Therefore Cisco would like to propose that the category definitions are made clear and unambiguous and that the current program scope is stated. Additionally, Cisco proposes that video phones should be considered for a future revision of the program and it would be appropriate to include a note stating this for the benefit of industry developers.

It should be acknowledged that the fundamental hardware requirements of video phones are different to those of voice-only phones and so the video phones should be treated as a separate category. This will ease the future addition of video phones to the program scope. Additionally, there is a section of the video-telephony market devoted to large-screen or immersive devices. These devices are designed and deployed with a usage model that is significantly different to other forms of telephony. For that reason, Cisco proposes that large-screen and immersive video conferencing systems should be treated in a separate program from desktop or cordless voice and video phones.

2 Specific proposals

2.1 Section 3, sub. A, Product Types

Item 1 (page 1, line 19).

Proposed solution: Change item 1 definition –

Telephone: A commercially available electronic product whose primary purpose is to transmit and receive sound and/or video over a distance using a voice or data network.

Item a (page 1, line 22) is restricted to sound-based devices.

Proposed solution: Change item a (to accommodate video)

a. Transmission Mechanism:

i. Analog Telephone: A Telephone or component of a Telephone system that ultimately converts sound into analog waveforms for transmission through an RJ11 connection.

ii. Voice over Internet Protocol (VoIP) Telephone: A Telephone or component of a Telephone system that ultimately converts sound and/or full-motion video into Internet Protocol data packets for transmission through an Ethernet connection.

iii. Hybrid Telephone: A Telephone or component of a Telephone system that ultimately incorporates the functions of both the analog telephone and the VoIP telephone described above.

Item b (page 2, line 35) add a category for video phones.

Proposed solution: add item v. definition –

v. Video Telephone: Telephone device with screen capable of making full-motion video and voice calls. Devices with a screen size > 10” diagonal may be considered to be Video Conferencing Systems rather than telephony devices, and hence are specifically not covered by this program.

Add a note (for the test plan, in advance of updated program requirements):

Video telephones are currently ineligible for Energy Star qualification under this revision of the program. EPA will consider amending this specification to include video telephones at a later date based on whether a proper test method can be developed and performance data collected to assess appropriate requirements.

3 Note for Program Scope Consideration

3.1 Note on Page 2, Line 47

Proposed solution:

Change the figure to include the category “Video Telephone.” Cellular video telephones (G3/G4/LTE etc.) are clearly NOT under consideration. It also seems unlikely that analog video telephones need to be considered. Using this diagram will show clearly that video telephones are NOT under consideration.

Add a note:

The extension of the program scope to include video telephones is under consideration for future revisions. Video telephones (with screens up to 10” diagonal) may be included in the scope or may continue to be excluded. Video conferencing systems (with screens > 10” diagonal) are NOT in the program scope.

4 Additional comments

4.1 Section 3, sub B, item 3 & 4

The definitions for Status Display and High Resolution Display are not mutually exclusive. As a result, a small (<5") display used for video would meet both definitions whereas a large (>5") display not used for video would meet neither definition. Furthermore, the use of "video" in the definition of High Resolution Display is the only use of the term in the document. It is therefore unclear whether the video described is part of a video telephony system or some other application. Given that Video Telephones are not being considered for this revision of the specification and given the other points of confusion, Cisco proposes the following definitions for High Resolution Display and Status Display:

3) High Resolution Display: A function by which a device provides a pixel-based visual display with resolution greater than or equal to 480x234 pixels. This definition does not include Status Displays.

4) Status Display: A function by which a product provides a visual display of less than 480x234 pixel resolution, including a back-lit alphanumeric clock or channel indicator. This definition does not include single indicator lamps.

Note also - This recommendation is made with the understanding that High Resolution Displays will be discriminated by the type, dimensions, and resolutions as indicated in the Test Data Template. Also note that the Test Data Template Row #40 currently only asks "Does the unit have a Display?", and does not include a method for the tester to record whether the device includes a High Resolution Display versus a Status Display. Cisco recommends adding an additional row between #40 and #41 that asks "Does the unit have a High Resolution Display or a Status Display?"

4.2 Missing section – "Reporting"

In most EPA Energy Star Program "Test Method" documents, there is a section giving guidelines for reporting. It is noted that the Telephony Test Data Template contains details and some explanatory text for the data to be reported, further information or broader explanations might be useful in a reporting section.

Note that the following information would also be useful for the data collection phase:

Encryption support (e.g. sRTP, VPN, etc.).

Extensibility – ability to run scripts, apps or similar.

Multi-line & multi-way calling support.

Satellite microphone(s), number and type.

Maximum sound level (dBA) for speakerphone.