

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

May 20, 2013

Dear ENERGY STAR® Small Network Equipment Stakeholder or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 3 Version 1.0 ENERGY STAR Small Network Equipment (SNE) Specification. Comments on Draft 3 are due to EPA **no later than June 7th, 2013.**

This draft incorporates input received from stakeholders in response to the ENERGY STAR SNE Draft 2 Specification and ENERGY STAR Final Draft SNE Test Method. The most recent version of the dataset, with manufacturer names masked, is available on the ENERGY STAR website. Questions and important discussion topics are highlighted in note boxes located throughout the draft specification. The following key changes are proposed in this Draft 3 version:

- Definitions – Section 1:
 - EPA has relocated and revised the Optical Network Termination Device (ONT) definition to clarify that ONTs will be treated as a separate product category.
 - EPA has removed the small home / small office (SOHO) definition.
- Scope – Section 2:
 - EPA has added an exclusion regarding Access Point products marketed and sold as enterprise network equipment which meet specified criteria.
- Efficiency Criteria – Section 3:
 - EPA conducted a final data assembly effort between February and March 2013. The results of this effort, combined with the further analysis of the dataset, led to revisions of base power allowances for several product categories and to the removal of the Cable modem – VDSL category in Draft 3.
 - Based on stakeholder feedback and additional product data received, EPA has created a new functional adder for telephony network interfaces and additional Wi-Fi adders for products shipped with simultaneous dual band Wi-Fi functionality enabled.
- Testing and Test Method Document:
 - EPA has revised the requirements on testing products that have both ADSL and VDSL functionality. In Draft 2, these products were required to be tested using their ADSL functionality, but because many of these products have additional features commonly found in VDSL-only products, EPA will now require these products to be tested with their VDSL functionality, and meet the VDSL base power allowance.
 - EPA intends to release the Final SNE Test Method within a few weeks of the release of the Draft 3 Specification. The following two changes will be incorporated in the final version of the test method.
 - EPA has clarified in the test method that commercially available traffic generators are not required to generate traffic for the purposes of this ENERGY STAR certification. Stakeholders can use either hardware or software to generate traffic as long as the traffic used for testing meets the requirements in Section 5.C of the test method.

- In response to stakeholder feedback describing the challenges of achieving an exact moving average of 1kb/s for the required 1kb/s data rate, EPA will allow defined ranges of variability in the moving averages of the 1kb/s and high data rates used during testing to reduce testing burden.

ENERGY STAR Draft 3 Stakeholder Meeting

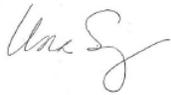
EPA will host a webinar on May 30th, 2013 from 1:00-3:00PM Eastern Time to discuss the key elements of the Draft 3 and answer stakeholder questions. To participate in this online meeting, **please RSVP by May 28th, 2013** via email to networking@energystar.gov with your contact information and "RSVP" in the subject line. Meeting details will be forwarded to participants shortly before the meeting.

Stakeholder Comments

Stakeholders are encouraged to review the attached documents and send comments to networking@energystar.gov **no later than June 7th, 2013**. For further information on specification development activities to date, visit the ENERGY STAR Product Development Web site at www.energystar.gov/NewSpecs and follow the link for "Small Network Equipment Version 1.0."

Thank you for your continued support of the ENERGY STAR program. Stakeholder participation is critical to developing a meaningful specification and to the overall success of the ENERGY STAR program. Please feel free to contact me at (202) 343-9024 or Song.Una@epa.gov; or John Clinger, ICF International, at (215) 967-9407 or John.Clinger@icfi.com with any questions or comments. Questions regarding the Small Network Equipment Test Method can be directed to Bryan Berringer, DOE, at Bryan.Berringer@ee.doe.gov or (202) 586-0371.

Sincerely,



Una Song
EPA Product Manager
ENERGY STAR for Office Equipment and Consumer Electronics