

Draft 2 Version 3.0 ENERGY STAR Telephony Specification Stakeholder Comment Summary and Response

Topic	Stakeholder Comments	Response
<p>Backlight Display Power Down Requirement</p>	<p>One stakeholder commented that a phone display that automatically powers down after 5 minutes could irritate the user particularly if they are referring to secondary information on the phone screen such as meeting times. The stakeholder recommended extending the time to 10 or 15 minutes.</p>	<p>Upon further consideration, EPA is proposing in the Final Draft specification that the Telephone backlight power off in 20 minutes or less, harmonizing with the Draft European Commission ErP Ecodesign Directive Lot 26 for Networked Standby in which “the period of time after which the power management function, or a similar function, switches the equipment automatically into a condition providing networked standby shall not exceed 20 minutes.”</p> <p>While EPA encourages manufacturers to design telephones that power down the display in less time than 20 minutes, the majority of the savings (achieved during nights and weekends) should remain unchanged.</p>
<p>Speakerphone/Audio Amplification</p>	<p>One stakeholder commented that the Conference Telephones have a relatively high base value of 2.5 W compared to a standard Corded VoIP Telephone at 2.0 W. The stakeholder noted that Conference Telephones are not unique in containing an audio power amplifier for a speaker. The stakeholder added that a typical high-end VoIP phone has to also support a network switch.</p> <p>Therefore the stakeholder requested the following changes to the base allowances:</p> <ul style="list-style-type: none"> - P-BASE (VoIP Corded Telephone): 2.0 W - P-BASE (VoIP Conference Telephone): 2.2 W - P-ADD (Handsfree&Open Listening/Conference Audio): 0.3 W* <p>*This additional NEW allowance for handsfree/open listening functionality also takes into consideration that a standard VoIP phone with handsfree/open listening functionality has to support the stronger more consumptive audio power amplifier and digital signal processor (DSP), compared to a handset-only phone, and would apply to both Corded and Conference phones.</p>	<p>EPA has decided to maintain the Draft 2 base and additional functionality allowances applicable to Conference and Corded VoIP Telephones. EPA notes that high-end VoIP Telephones that support a Gigabit Ethernet switch receive a 1.0 W allowance that also serves as a proxy for higher-end functionalities such as stronger audio power amplifiers and DSP capability. Since these functionalities are not active and directly tested in Partial On Mode, EPA maintains they do not need separate allowances.</p> <p>Per review of the EPA dataset and models on the market, most Corded VoIP Telephone intended for desktop use offer speakerphone functionality and handsfree headset jacks such that the basic functionality is covered under the existing proposed allowances to recognize the most energy efficient models. Finally, EPA has not received additional data for Conference VoIP Telephones that justify reducing the base allowance in absence of a "Handsfree&Open listening/Conference Audio" additional allowance as proposed by the stakeholder.</p>

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Corded/Cordless Analog Telephones	<p>One stakeholder recommended that combination products consisting of a base station with a corded handset and any number of Additional Handsets should be treated as Cordless Telephones, not Corded Telephones. The stakeholder argued that although these phones have a corded handset, they are essentially cordless base units without charging cradles. Since there are no criteria related to the handset charging mode, the stakeholder suggested that these models be allowed the same power usage as other Cordless base units at 1.3 W. Instead the proposed 1.1 W allowance for Corded Analog Telephones should apply to corded telephones that do not include a cordless radio in the base.</p>	<p>In proposing the Draft 2 base allowances for Analog Corded (1.1 W) and Cordless (1.3 W) Telephones, EPA reviewed thirty-five Version 2.2 ENERGY STAR certified base station models with a corded handset and found a statistically significant lower average Partial On Mode power of 0.85 W compared to an average power of 1.29 W for the 667 Cordless models in the dataset. While the ENERGY STAR Telephony Test Method and Specification do not test and assess charging function explicitly, these data and battery charging product data indicate that there is maintenance power associated with the charging cradle for the Cordless Telephone base. For these reasons, EPA is maintaining the separate Analog Corded and Cordless Telephone base allowances in the Final Draft Specification.</p> <p>At this time, EPA does not have data for Corded Telephones that do not include a radio to communicate with Additional Handsets and is therefore unable to provide them with same power allowance given to Cordless base units.</p>
Draft 2 Efficiency Criteria	<p>One stakeholder recommended that the base power allowances for telephony not be changed beyond what is currently proposed in the Draft 2 Specification noting that the base power allowances proposed for the Version 3 specification represent a significant increase from the efficiency required in the Version 2.2 ENERGY STAR Program Requirements. ICT vendors continue to prioritize energy efficiency in the engineering, manufacture and life cycle of new products and solutions. As proposed, the stakeholder further noted that the base power allowances in the Draft 2 Specification will recognize and reward energy efficiency technology leadership and innovation and moving beyond the proposed base power allowances in Draft 2 would be unrealistic and negatively impact the specification.</p>	<p>Given this feedback and that EPA did not receive additional data or requests not contained herein warranting modification of the criteria, EPA has maintained the Draft 2 Specification base allowances and additional adders for all product categories in the Final Draft Specification.</p>