TO: **Ms. Katherine Kaplan**
           Mr. R.J. Meyers
           U.S. Environmental Protection Agency (EPA)

FROM: **Ken J. Salaets**
           Director
           ksalaets@itic.org

DATE: **June 11, 2012**

SUBJECT: **Draft 2 of Version 6.0 of the ENERGY STAR® Computer Specification**

Once again, I welcome the opportunity to submit comments on behalf of the member companies of the Information Technology Industry Council (ITI), in response to the above referenced document. Please feel free to post this memo on the relevant agency web site.

We appreciate the opportunities that have been afforded our team to engage in direct discussions with you and your consultants on issues of concern, e.g., with the qualified product database. That particular collaboration helped to resolve many concerns about baseline data that the agency was using to develop a proposed Version 6 specification. Indeed, we would like to recommend a new "rule of thumb" going forward. Given that the ENERGY STAR® program is largely data-driven, it is critical that future proposals – including those from industry and other stakeholders – are accompanied and supported by data *at the time the proposal is offered*. In addition, the supporting data must be shared with all stakeholders in order to ensure that all interested parties have an opportunity to effectively evaluate and comment on the potential risks and benefits of the proposal in question. Adhering to this policy will increase confidence in the ENERGY STAR specification development process and help produce outcomes that are realistic and achievable. We would welcome the opportunity to discuss this idea in greater detail, if necessary.

We also thank you for sharing ITI's categories proposal with other stakeholders, and for allotting time during the last face-to-face meeting for our team members to walk through the proposal. We believe that all other progress on the Version 6 specification is dependent on finalizing the

categories discussion, so we recommend that this be the next order of business as you move toward creating Draft 3.

Finally, we would like to address the issue of timing. As we discussed in last week's EPA/ITI conference call, in order to minimize disruptions in existing product shipments and new product rollouts, manufacturers need to have the ability/opportunity to qualify products to the latest version of ENERGY STAR product specifications *prior* to the effective date. Currently, program requirements prevent this.

This is critical for several reasons:

- EPA does not allow the grandfathering of qualified products, forcing manufacturers to re-qualify eligible products under a revised specification

- Revisions to product specifications typically involve many technical changes, including new product categories, limits, adders, etc., which require time and resources to implement; and

- Manufacturers are unable to "transition" to new requirements in a single day, i.e., when a revised specification is officially published, due to the limited CB capacity and the duration of qualification tests, posing risks of market disruptions and lost revenues (both major impediments to maximizing participation in ENERGY STAR).

Similarly, as was discussed in the recent in-person meeting, industry requests that ENERGY STAR post-market surveillance be suspended once a new revision has been published, and not be resumed until after the relevant new effective date.

This is essential for several reasons:

- As noted above, all models currently qualified under ENERGY STAR must be re-tested to the new specification once the test labs and CB's are capable

- It would be costly and meaningless to require current models that can meet and are subsequently qualified under a newly-revised, more stringent specification to be tested to verify compliance with a previous and soon-to-be obsolete older version of the product specification; and

- Manufacturers and test labs will no longer be able to re-test models under the current version of a product specification because they will be changing over their internal validation tools to prepare for the new version.

As was indicated during the aforementioned conference call, manufacturers have not yet had sufficient time to fully evaluate the changes made to Draft 2 of the computer specification. Consequently, the balance of these comments will be by necessity fairly high-level, reiterating

concerns that we have already shared during the previous meetings and teleconferences. Assuming that sufficient time is allotted for evaluating Draft 3, we anticipate once again being in the position to offer a more comprehensive response. The following table summarizes our concerns with Draft 2:

TOPICS	KEY ISSUES
Desktops, AIO, and NB (Dataset, base TEC targets, display adders, alternative categories)	• Resolution on category system, display adder equation, enhanced display multiplier, DT/AIO data integrity • Version 5 data integrity (short idle, display adder)
Client Discrete Graphics (classes, adder approach)	• GPU adders: DC short/long idle power delta; PSU efficiency; switchable graphics treatment
Workstations	• Need validation of SPECWorkstation benchmark approach for active mode data, before agreement on data collection during WS qualification activity (Compliance per V5 requirements)
Small-scale servers	• Resolution on TEC category and adder approach • Current WOL adder, and Pidle_Max and Poff_Max not sufficient (limits flexibility)
Thin Clients	• Off, and idle limits not sufficient • Thin Clients with dGfx need separate category or adders
Test methodology	• Dark room, test procedure conflicts, etc.
Additional Considerations	• Use of ENERGY STAR requirements for MEPs programs (need a clause to discourage practice)
Slates and Mobile Computing approach	• Agreement on ENERGY STAR BCS metric and criteria or slates • Harmonization approach with DOE/CEC • Labeling, CB scope issues, etc.

NRDC Proposals	• Power supply incentive proposals lack ecosystem cost/benefit analysis. Without such information, it is difficult to justify adoption of this recommendation. We look forward to reviewing the analysis that NRDC has agreed to provide.
	• <u>Duty Cycles</u> – QDI, Chetty data not aligned with major studies. The differences need to be explained before the EPA and stakeholders can fully evaluate the rationale and corresponding recommendation.
	• <u>Need to revisit Power supply requirements</u> – We still question the rationale for penalizing systems that meet TEC but not 80Plus. Europe, Japan and China are all moving away from the 80Plus mandate, choosing instead to focus on total energy efficiency. This program anomaly is one of the issues that most attracts the interest and attention by parties not directly involved in the specification discussions.

As always, we would welcome the opportunity to provide additional details or respond to any inquiries that EPA and other ENERGY STAR stakeholders may have.

Thanks.