



June 8, 2012

Mr. Robert Meyers
Product Manager, ENERGY STAR Computers
U.S. Environmental Protection Agency

JEITA's Comments on Energy Star Computers Ver 6.0 Draft 2

Dear Mr. Robert Meyers,

The Japan Electronics and Information Technology Industries Association (JEITA) appreciates the opportunity to provide comments on the ENERGY STAR Computers Draft 2 Version 6.0 released by the U.S. Environmental Production Agency.

JEITA is the largest electronics trade association with more than 400 companies in Japan covering consumer electronics, industrial electronics, semiconductor, and other electronic components. We welcome the EPA's proactive efforts to improve the ENERGY STAR program. We also strongly support the ENERGY STAR program.

In this document, we would like to submit our views on the Computer Version 6.0 Draft 2 specification as follows:

[Partner Commitments Draft 2 Version 6.0]

Page.1 Qualifying Products

3. Ensure that any model associated with the ENERGY STAR name or mark meets the following standards:

We have agreed your decision not to include Toxicity and Recyclability requirements in the product eligibility criteria and also understood your proposed action to indicate the requirements in ENERGY STAR Computer Partner Commitment, however, we should not describe any responsibility related to toxicity and recyclability by ENERGY STAR Computer Partner for reasons below:

Many states of the United States of America are addressing/discussing how to control toxic materials. Enactment of multiple similar standards will confuse users and cause an unnecessary increase in the social cost.

For recyclability requirements, existing EPEAT program is functioning effectively, and is being accepted widely. Introduction of a similar standard, again, may confuse users and lead to an unnecessary increase in the social cost.

Page.2 6.1.1.

Concerning the labeling requirements:

The labeling requirements should be relaxed, as there are cases where labeling is difficult due to the design or model of a Tablet Computer, Slate Computing Device, etc.

If Slate Computing Devices are subject to the requirements, the top or front of a Slate Computing Device is a touch screen display, which will be the access area for the user.

It will be difficult to satisfy the requirement, as it is impossible to attach a label in the user access area even temporarily.

The alternative of showing an electronic labeling for 5 seconds would also be difficult, as the start-up time of a computer is designed to be as short as possible.

Based on the above, we propose the revisions as follows:

“Partner must use the ENERGY STAR mark in one of the following ways:”

> “Partner may use the ENERGY STAR mark in one of the following ways:”

”1) Via permanent or temporary label, on the top or front of the product.”

> ”1) Via permanent or temporary label, on the product.”

”a. The ENERGY STAR mark in cyan, black, or white must appear at system startup, and must display for a minimum of 5 seconds;”

> ”a. The ENERGY STAR mark in cyan, black, or white must appear at system startup, and must display for a minimum of 200 milliseconds;”

[Eligibility Criteria Draft 2 Version 6.0]

Line253 2.1 Included Products

Handheld Computers (including eReaders) and Smart Phones typically use the same architecture as a Slate Computing Device, and it is difficult to clearly distinguish between Slate Computing Devices and Handheld Computers. Therefore, “iii. Slate computing devices” should be excluded in the same way as Handheld Computers are excluded.

Concerning “ii. Notebook Computers and Tablet Computers,” such devices not equipped with the wired LAN capability are designed to receive the operational power supply mainly from a battery, in the same way as a Slate Computing Device, and they are not intended for long hours of use on an ac mains power source.

Therefore, devices not equipped with the wired LAN capability should be excluded (or included in the scope of the standard for Battery Charging System) in the same way as Slate Computing Devices should be excluded.

Line253 2.2 Excluded Products

As was discussed above, Handheld Computers (including eReaders) and Smart Phones typically use the same architecture as a Slate Computing Device, and it is difficult to clearly distinguish between Slate Computing Devices and Handheld Computers.

We understand that EPA is focusing on the battery charging efficiency of Slate Computing Devices. However, this point should be discussed for all battery-operated devices equally, not only for Slate Computing Devices.

Therefore, it is not appropriate to discuss the battery charging efficiency-based eligibility criteria specifically for Slate Computing Devices only, of all the various ENERGY STAR Computers.

Battery charging efficiency should be discussed separately, and Handheld Computers (including Slate Computing Devices) should be excluded from the scope of the ENERGY STAR Computers.

Concerning Notebook Computers (Tablet Computers), such devices not equipped with the wired LAN capability are designed to receive the operational power supply mainly from a battery, in the same way as a Slate Computing Device, and they are not intended for long hours of use on an ac mains power source.

Therefore, devices not equipped with the wired LAN capability should be excluded (or included in the scope of the standard for Battery Charging System) in the same way as Slate Computing Devices should be excluded.

Line 299 3.2.3 External Power Supplies (EPS):

Single-output EPS is in the scope of the International Efficiency Marking Protocol and Multi-output EPS is out of its scope. Therefore, the marking requirements should be applicable only to Single-output EPS as proposed below:

“EPS shall meet the level V performance requirements under the International Efficiency Marking Protocol and include the level V marking.”

> “EPS shall meet the level V performance requirements under the International Efficiency Marking Protocol and include the level V marking for Single-output EPS.”

Line359 Table 3: Categorization of Desktop and Integrated Desktop Computers

The proposed categorization groups Desktop Computers using a notebook architecture and Desktop Computers using a desktop-only architecture in the same category.

The CPU performance of a notebook architecture and that of a desktop architecture are different. Therefore, the categorization should be revised to the new categorization proposed by ITI (Information Technology Industry Council).

Line362 Table 4: Categorization of Notebook Computers

The proposed categorization groups Notebook Computers using an architecture designed for lower power consumption and ordinary Notebook Computers in the same category.

The architecture designed for lower power consumption lowers CPU performance.

Therefore, the categorization should be revised to the new categorization proposed by ITI, in the same way as the Desktop Computer categorization should be revised.

Even if the ITI-proposed new categorization is not adopted, the current categorization leaves grey areas, so it needs to be revised as follows:

For the Categories NB0 and NB1, there should be a clear statement to the effect of “all Notebook Computers that do not satisfy the definitions of NB2, 3, or 4 are included here.”

For the Categories NB0 and NB1, the criteria concerning CPU Cores, Channels of Memory, and Screen Size should be deleted.

To obviate confusion, Categories NB0 and NB1 should be grouped into a single category.

Line388

In case of a Tablet Computer using a Smart Phone architecture, it does not have a discrete Sleep mode defined separately from a Long Idle mode.

Therefore, the following statement should be added, in the same way as in the case of Desktop Computers.

For Notebook Computers that lack a discrete System Sleep Mode but have a Long Idle State power level less than or equal to 3.0 W, power in Long Idle (PLONG_IDLE) may be used in place of power in Sleep (PSLEEP) in Equation 1. In such instances, the second term of Equation 1, (PSLEEP * TSLEEP), is replaced by (PLONG_IDLE * TSLEEP); Equation 1 remains otherwise unchanged.

Line 437 Table 9: Function Adders for Desktop, Integrated Desktop, and Notebook Computers

Concerning Display Adder:

The unit of measure of A in the Adder calculation formula is unclear. (Is it in*in or mm*mm?)

The unit of measure of TEC Adder should be kWh, not W. Therefore, to convert it kWh, Display Adder should be multiplied by a factor of (8.76* TSHORT_IDLE).

Integrated Desktop Computers and Notebook Computers share the same LCDs. The reason behind using different Adder calculation formula is unclear. The same formula should be applied to both.

In comparison to Draft1, the coefficients A and r and the constants in the Adder calculation formula are significantly smaller.

<p>• Display Adder Formulae: Comparison between Draft 1 and 2</p> <p>Draft 1: 12 inch or less</p> $1971/250*(0.1667*A+2r+1)$ $=7.884(0.1667*A+2r+1)$ $=1.3142628 *A + 15.768 *r +7.884$ <p>Draft 2: Notebook in general</p> $2*r+0.02*A$ $=0.02 *A + 2*r + 0$

In the same way as in Energy Star Displays Ver 6.0 Draft 3, the screen size should be considered in calculation of the power consumption of an LCD.

Line544-547 3.9 Requirements for Consumer Benefits

If Toxicity and Recyclability requirements are deleted, “Requirements for Consumer Benefits” should be deleted from the Specification.

Line621 4.3.2

For qualification of a Product Family, it is required to test the configuration of the worst-case power consumption of the said product family. In the case of a third-party certification, the certification body determines if the tested configuration is indeed the configuration of the worst-case power consumption, and certifies the said configuration.

Including a non-qualifying alternative configuration in the possible configurations of a qualifying model means that the qualification of the model is not based on the testing/certification of the worst-case power consumption. This directly contradicts the requirement.

If non-qualifying configurations are included in the possible configurations of a qualifying model, a list of the non-qualifying configurations and their test results should be submitted to the certification body, in addition to the qualifying configuration of the worst-case power consumption. However, it would be difficult to implement it in reality; therefore, non-qualifying configurations should not be allowed to be included in the configurations of a qualifying model.

Based on the above, the passage of Line 622-628 that reads, “If a Partner...ENERGY STAR qualifying configurations)” should be deleted. Alternatively, it should clearly state as follows: “If a Partner wishes to include non-qualifying configurations in the configurations of a qualifying model, the Partner must submit a list of the non-qualifying configurations and their test results to the certification body, in addition to the qualifying configuration of the worst-case power consumption.”

Sincerely,

Takayuki Kobayashi

Chairman, PC Energy Saving Working Group

Japan Electronics and Information Technology Industries Association (JEITA)