Pantano, Stephen

From:	David Vellante [david.vellante@wikibon.org]
Sent:	Friday, July 03, 2009 2:18 PM
To:	storage@energystar.gov
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Subject:	Wikibon community comments on EPA storage framework
Follow Up Flag:	Follow up
Flag Status:	Green

Dear Mr. Fanara and Mr. Pantano:

On behalf of the Wikibon community, we would like to thank you for the opportunity to provide feedback to the United States Environmental Protection Agency's Specification Framework Document for version 1.0 of the ENERGY STAR Enterprise storage program.

We are encouraged that you engaged with Wikibon prior to releasing the Framework and we look forward to providing further resources to support the EPA's objectives.

We have read the specification document and have several comments that have been solicited from the broader Wikibon vendor and user communities. In summary:

1. We received a clear consensus from the Wikibon community that we should positively support the EPA in this endeavor;
2. Our community believes that improving the efficiency of power supplies is a useful and productive initiative;
3. Software in our view remains the largest opportunity to reduce energy consumption in enterprise storage, and we request that the EPA includes a discussion of software at the July 20th meeting in San Jose;
4. We recommend the EPA define a standard of improvement that is significantly higher than that which we inferred from the framework;
5. We propose that vendors are allowed to meet this standard by choosing the combination of power supply and software that aligns with their specific market focus, customer requirements and technology portfolios.

We believe a specification that narrowly focuses on improving power supply efficiency will potentially result in a negative backlash to the ENERGY STAR brand. We believe this because suppliers and customers that are achieving much higher levels of energy savings through technologies other than power supply efficiencies will call into question the legitimacy of the standard. Ultimately we believe this could confuse buyers of storage technologies and undermine the EPA's objectives.

In summary, we believe the EPA should consider including software functionality in its specification for achieving an ENERGY STAR rating for enterprise storage. This will allow for more aggressive energy savings to be set as a standard for Energy Star certification. The vendor, in our view, should be given the choice of how to achieve these energy savings against an agreed-upon baseline.

Wikibon is proud to have had the opportunity to represent its collective opinion to the EPA and would

be happy to present findings of its analysis, field data and software measurements at the July 20th meeting in San Jose.

We look forward to continued dialogue.

Regards,

David Vellante for The Wikibon Community

Best regards,

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