

Comment from METI on
1st Draft - ENERGY STAR® Computer Specification (Version 5.0)

EEPA Tool

- Currently some stakeholders volunteered to collect data of PC usage by using UTrack or PCUsage. Please explain EPA's plan on how to incorporate the collected data into EEPA tool.
- Does EPA have an intention to take PC usage differences between at home and in office into account: for example, providing different calculation formulas, workloads, or criteria for home-use PCs and office-use PCs?
- TV tuner is a standard feature for almost all of home-use PCs currently sold at retail stores in Japan. Therefore, the test method and/or criteria in Version 5.0 shall allow for this feature.

EPS

- EPS requirement in Draft 1-Computer version 5.0 states that EPS must be 1) ENERGY STAR qualified or 2) meeting the no-load and active mode efficiency levels provided in EPS version 2.0. Regarding EPS of 2) above, please include a statement clarifying that they are only required to meet those efficiency levels when tested at a test voltage of their main product (e.g. computers) and do not need to meet other requirements.

WOL Requirement

Centralized control of OFF/ON computers seems not common in Japan, instead people usually shut down their PC when they leave office for home. Manufacturers ship computers with WOL enabled only when they receive such request from their customers utilizing the centralized control. In light of this current status in Japan, "Computers should be tested and reported as shipped for Sleep." and "Models sold through enterprise channels...shall be tested, qualified, and shipped WOL enabled." are incongruent. Therefore, the line explaining about models sold through enterprise channels shall be revised/modified or deleted.

Qualifying Families of Products

EPA requires all of the models within a family, or series, to meet ENERGY STAR criteria when qualifying the family. For the purpose of reducing manufacturer reporting burden, it seems reasonable. However, this approach leaves some types of computer families behind, and the burden for manufacturers may not be reduced sufficiently. In fact, a lot of computer families have numerous variations in configuration to meet consumers' needs nowadays. Sometimes these

complex families have so many models that the manufacturers can hardly submit them one by one. At the same time, it is very difficult for such families to have all models being capable to meet ENERGY STAR criteria due to the large variation. Similar scenario is also applicable to BTO models of computers. In order to ease the reporting burden of manufacturers of such complex families and BTO models, we suggest an inclusion of an additional option for qualifying families, which is to submit a qualifying portion of family under a representative model name along with information about qualifying conditions of configuration (e.g. CPU, HDD, Memory, etc.).