

March 14, 2008  
JBEE|08-0045

*From* Jos Beekwilder (Océ)  
*To* K. Kaplan (EPA)  
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*Copy*

*Subject* **Océ position on draft 1 ENERGY STAR  
program requirements for computers v5.0**

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## **1 Introduction**

Océ welcomes the opportunity to contribute to the development of the ENERGY STAR program requirements for computers. Although Océ does not manufacture computers in general, they form part of our imaging products as Digital Front End (DFE) modules. The ENERGY STAR program requirements for imaging equipment allow the utilization of DFE's, whose energy consumption is not taken into account when measuring the energy consumption of imaging equipment, provided that the DFE complies with the ENERGY STAR requirements for Desktop Derived Servers. Océ's comments are therefore limited to the sections in the computer requirements that are relevant for Desktop Derived Servers.

## **2 General comments**

In the draft document, no provision is made to account for variations in energy consumption between units of the same product (due to production tolerances). We would expect to find some guidance on required procedures in case a tested computer has energy consumption within a small percentage above or below the ENERGY STAR requirements. This situation becomes more urgent as the ENERGY STAR requirements are becoming more strict over time.

## **3 Specific comments for different sections**

The following comments refer to line numbers in the received draft 1, ENERGY STAR program requirements for computers v5.0.

### Lines 107-127:

As explained, a number of Océ imaging products use a desktop derived server as DFE. In such cases, the computer is sold as a module of the imaging equipment. The user documentation of the imaging product will contain information on power management settings and the effects they have on energy consumption, pertaining to the entire imaging product. This user oriented information does not include detailed data on the separate effects of power management settings for the energy consumption of the DFE. Océ proposes that DFE's used in imaging equipment (i.e. not sold separately as stand-alone products) are exempted from the requirements formulated in these lines.

### Lines 247- 250:

Two comments:

1. The criteria for class B emissions compliance are different for different countries around the world. Océ proposes that a

- single, globally recognized emission standard and criterion is used for desktop derived servers.
2. It should be noted, that dual socket products are sold in the desktop computer market, especially for high end applications (very powerful systems e.g. for processing color images at high speeds). Restricting the range of desktop derived server products to single processor capability would exclude a class of servers that are still too small to be covered by the ENERGY STAR requirements for servers. Océ proposes that dual processor products are included in the scope definition of desktop derived servers.

Line 276:

Océ wants to clarify the backgrounds of the situation that we did not qualify any desktop derived servers under ENERGY STAR for computers version 4.0. As explained in section 1, Océ sells desktop derived servers as parts of imaging products. While Océ strives for ENERGY STAR qualification of its imaging products, additional ENERGY STAR qualification for the included optional modules is not necessary from a customer point of view: our customers understand and appreciate the ENERGY STAR qualification of our imaging products. When such a product is sold with a DFE, the ENERGY STAR qualification applies to the whole product, including the DFE. Additional formal qualification of the DFE would cost repeated additional effort, because the hardware of the DFE-modules tends to change repeatedly during the lifecycle of an imaging product. On the other hand this additional formal qualification has no added value for our customers, because the imaging product is already ENERGY STAR qualified.

Line 280:

Océ is willing to assist in data collection for a market survey of the energy consumption of Desktop Derived Servers. We would like to bring to attention of EPA, that energy consumption of these products is related to functionality (processor speed, application for color or B/W products, number of HDD, size of RAM). In general we would expect the energy consumption of Desktop Derived Servers to be comparable with mid- to high-end desktop PC's present on the market.

Line 345:

Océ would like to point out, that S4 and S5 modes according to ACPI standards may include a wake-up on LAN function. In such cases, a computer in S4/S5 is in networked standby according to the definitions used in the draft implementing measures within the EuP framework (2005/32/EC) in Europe. Off-mode, on the other hand, in the EuP definition is more likely to correspond to ACPI G3 (mechanical off). Océ calls for using of globally harmonized energy consumption mode standards, such as defined in the US Energy Independence and Security Act of 2007 (section 310).

Line 429:

The power supply efficiency requirements mentioned in this section may not be feasible for Desktop Derived Servers. Because of the design of these computers, dedicated for high reliability and industrial grade products, Océ is not sure if Desktop Derived Server hardware that complies with these requirements is available on the market in time: industrial grade PC's have lifecycles between 3 and

5 years and thus are slower than consumer PC's in adopting new (e.g. energy saving) technology standards.

Line 559:

Table 3 mentions an additional power allowance for WOL during sleep mode. However, no sleep mode power level is mentioned in the upper part of this table, based on the definition of desktop derived servers that says that they "must be operational 24 hours/day and 7 days/week" (line 254-256). Océ proposes that EPA removes the reference to "sleep mode" from table 3.

Line 589:

For table 5, the same applies as for table 3 (see previous section). Enabling sleep mode for a Desktop Derived Server does not make much sense when it has to be always available except for a small amount of unscheduled downtime.

#### **4 Follow-up**

Océ is prepared to provide further clarification to EPA to support the comments made in the previous sections. If EPA needs further input from Océ, please send a request to Jos Beekwilder via e-mail ([jos.beekwilder@oce.com](mailto:jos.beekwilder@oce.com)) or telephone (+31 773594494).