

## **Dell**

Page 3 specifically states that the specification only applies to single output voltage power supplies. Does that mean if a power supply was modified to have 2 outputs the requirements of this document would not need to be met? This is assuming that the purpose and use of the power supply is unchanged.

Page 3, Line 70 & 71: What does it mean to have a battery "directly connected"?

How does the EPA intend to consider cost? (See page 5 where the EPA states cost will be considered in setting the new level.)

Are the PFC requirements an option for tier 2 requirements? (Page 5) Dell requests some clarity on the EPA's intentions regarding PFC. The EPA needs to realize that additional PFC requirements might actually lower the PSU efficiency.

Page 6. Section 4A. The wording is confusing. It sounds like the specification says if there is a safety requirement relevant to the power supply then it's an EPA requirement too. It's not clear what the EPA is accomplishing here.

Page 8 Section 7 describes different Roman Numeral "grades" based on the efficiency level. We need additional detail on what levels qualify for a certain grade. Knowing these levels and their intended purpose is very important.

Concerning the partner commitments, why is the EPA requiring manufacturers to update the list quarterly page 2 (1st bullet)? On page 1 (3rd bullet) the EPA requires manufacturers to qualify 1 power supply within 3 months of activating the agreement. Manufacturers should be provided the flexibility of posting product information as they are placed on the market. Manufacturers may not place new power supplies on the market every quarter. As this document reads the manufacturers would then be removed from the list if no new products are put on the market every 3 months.